

JAMIE LYNN GALLIAN  
16222 MONTEREY LANE UNIT 376  
HUNTINGTON BEACH, CA 92649  
714-321-3449  
JAMIEGALLIAN@GMAIL.COM

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA-SANTA ANA DIVISION

IN RE:,

JAMIE LYNN GALLIAN

DEBTOR

Case No.: 8:21-BK-11710-SC

REQUEST TO ADDRESS THE COURT ON 8/27/2024  
AT 1:30PM  
NOTICE OF LODGEMENT OF RONALD J.  
PIERPONT NOTICE OF MOTION AND MOTION TO  
SET ASIDE DEFAULT JUDGMENT.

TO THE HONORABLE SCOTT C CLARKSON, UNITED STATES TRUSTEE, CHAPTER 7 TRUSTEE, AND  
HIS ATTORNEY'S OF RECORD

**PURSUANT TO THE COURTS TENTATIVE RULING, DEBTOR SEEKS PERMISSION**

TO THE HONORABLE SCOTT C. CLARKSON, Ms. Jamie Lynn Gallian would like to request permission to  
address this Honorable Court on Tuesday, August 27, 2024, at 1:30pm.

In the interest of justice, fairness and equity, Ms. Gallian respectfully asks this Court for an opportunity to address  
the Court regarding the two matters now before this Court. Ms. Gallian has suffered for weeks from the Covid-19  
illness and has still not fully recovered. For this reason Ms. Gallian believes that important matters be brought to the  
for the Court's attention and consideration before the Court final decision is determined on the two Motions

EXECUTED THIS 26<sup>TH</sup> DAY OF AUGUST, 2024 AT HUNTINGTON BEACH, CA COUNTY OF ORANGE

  
JAMIE LYNN GALLIAN

NOTICE OF LODGEMENT OF RONALD J. PIERPONT NOTICE OF MOTION AND MOTION TO SET ASIDE  
DEFAULT JUDGMENT. - 1

1 RONALD J. PIERPONT  
2 16222 Monterey Ln. Unit 376  
3 Huntington Beach, CA 92649  
4 (203)715-6259

4 [Ronpierpont7@gmail.com](mailto:Ronpierpont7@gmail.com)

5 Defendant In Pro Per

6  
7 **UNITED STATES BANKRUPTCY COURT**  
8 **CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION**  
9

10 In re

11 JAMIE LYNN GALLIAN,

12 Debtor.

13  
14 JEFFREY I. GOLDEN, Chapter 7 Trustee

15 Plaintiffs,

16 v.

17 **RONALD J. PIERPONT;**  
18 **J-SANDCASTLE CO., LLC; J-PAD LLC;**  
19 **STEVEN D. GALLIAN; BRIAN J. GALLIAN;**  
20 **MINOR GALLIAN; JUSTIN BARCLAY;**  
21 **ROBERT J. MCLELLAND;**

22 Defendants.

Adv. No. 8:23-ap-01064-SC

Case No. 8:21-bk-11710-SC

Chapter 7

**NOTICE OF MOTION AND  
MOTION TO SET ASIDE ENTRY OF  
DEFAULT AND DEFAULT JUDGMENT,  
FOR MISTAKE, INADVERTENCE, AND  
EXCUSABLE NEGLECT CCP 473.6;  
POINTS AND AUTHORITIES;  
DECLARATION OF RONALD J.  
PIERPONT**

[FRBP 9024; FRCP 55(b); FRCP 60(b)(1);  
FRBP 7012(b); FRCP 12(b)(5); FRBP  
7004(b)(9)]

(Filed concurrently with Notice of Motion.)

Hearing on Motion to Set Aside:

Date: 9/24/2024

Time: 1:30P.M.

Courtroom: 5C

411 E Fourth Street, Santa Ana, CA 92701

23  
24 **TO ALL PARTIES AND TO THE THEIR RESPECTIVE ATTORNEYS OR RECORD:**

25 **PLEASE TAKE NOTICE that Defendant RONALD J. PIERPONT (“Defendant”)**

26 **hereby gives notice that 9/24/2024, at 1:30P.M. in Courtroom 5C of the United States**

27 **Bankruptcy Court located at 411 E. 4<sup>th</sup> Street, Santa Ana, CA 92701, Defendant will move the**  
28

1 **Court to Vacate the Default Judgement entered against Ronald J. Pierpont on or about May 10,**  
2 **2024**

3 **TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY**  
4 **JUDGE, UNITED STATE TRUSTEE, AND ALL OTHER INTERESTED PARTIES:**

5 **I. INTRODUCTION**

6 By way of this motion, Ronald J. Pierpont, (“defendant”) respectfully moves this honorable  
7 court to set aside the entry of default under FRCP 55(c) in that the complaint and summons were not  
8 served on the defendant as required by law; Defendant Pierpont inadvertently failed to respond due to  
9 his mistake, inadvertence, and/or excusable neglect and was not living in the State of California during  
10 the period of appearances in the United States Bankruptcy Court.

11 Crucially, “judgment by default is a drastic step appropriate only in extreme circumstances; a  
12 case should, whenever possible, be decided on the merits.” *United States v. Signed Pers. Check No.*  
13 *730 of Yubran S. Mesle*, 615 F.3d 1085, 1091 (9th Cir. 2010).

14 Here, in the majority of the calendar year 2023, the defendant was suffering a psychotic break,  
15 increased state of paranoia and delusions, unable to know the difference between what was real or his  
16 psychosis, Defendant was not behaving like himself. Defendant sought intervention by medical  
17 professionals with short term stays at Hoag Hospital and St. Joseph Hospital. Defendant was not  
18 responding to out-patient treatment. In or about August 2023, defendant hit rock bottom with a 5 day  
19 stay in the Orange County Men’s Jail. This was the turning point for Defendant Pierpont. During this  
20 time, the Debtor was not in contact with Mr. Pierpont.

21 Mr. Pierpont, originally from Connecticut where he was born and where his mother, brother,  
22 sister-in-law, and his three adult children still reside, flew home to Connecticut to seek help from his  
23 family members.

24 Upon arrival in Connecticut, Mr. Pierpont sought the support of his mother. Mr. Pierpont  
25 stayed with his mother for a few weeks. He began working in an automotive shop and was offered a  
26 room at the Owner of the Automotive Shop temporarily. Due to unstable events, continued delusions,  
27 periods of psychosis, problems with reality and continued psychotic mental breaks, and other negative  
28

1 events in the defendants life, Mr. Pierpont's older brother, Richard Pierpont in consultation with  
2 family members made the difficult decision to intervene .

3 Mr. Pierpont was involuntarily committed to a drug rehabilitation program for an extended  
4 period of time in the State of Connecticut. Defendant was not aware of the Plaintiff's Adversary  
5 Complaint and Summons served by U.S. Mail on or about July 6, 2023, docket 3, to an address in  
6 Yorba Linda, CA. Mr. Pierpont has never resided at this address. When first moving to California for  
7 work in 2010, Mr. Pierpont was staying in Big Bear, CA during a training program he attended.

8 Defendant did not appear in the United States Bankruptcy Court because defendant Pierpont  
9 was not aware of any U.S. Mail Service of a Complaint or Summons until July 2024. No U.S. Mail  
10 was sent to Connecticut by the Plaintiff. Plaintiff apparently used an incorrect address listed on the  
11 Debtors petition. Plaintiff's lack of due diligence may have contributed and caused this error.

12 Accordingly, Defendant respectfully requests that the entry of default and default judgment be  
13 set aside for failure to serve the defendant in Connecticut by U.S. Mail, therefore defendants excusable  
14 surprise, excusable mistake and inadvertence for defendants non-appearance in the bankruptcy court  
15 be set aside and Defendant wishes to file an answer and defend himself in this action.

16 **II. GOOD CAUSE EXISTS TO SET ASIDE THE ENTRY OF DEFAULT**  
17 **AND DEFAULT JUDGMENT**

18 Federal Rules of Bankruptcy Procedure, Rule 7055 provides that: "Rule 55 F.R.Civ.P. applies  
19 in adversary proceedings." In turn, Federal Rules of Civil Procedure, Rule 55(c) provides that "The  
20 court may set aside an entry of default for good cause." The "factors derived from the 'good cause'  
21 standard that governs the lifting of entries of default under Fed.R.Civ.P. 55(c) govern the vacating of a  
22 default judgment under Rule 60(b) as well." *TCI Grp. Life Ins. Plan v. Knoebber*, 244 F.3d 691, 696  
23 (9th Cir. 2001), *as amended on denial of reh'g and reh'g en banc* (May 9, 2001).

24 Federal Rules of Bankruptcy Procedure, Rule 9024, provides that "Rule 60 F.R.Civ.P. applies  
25 in cases under the Code...." In turn, Federal Rules of Civil Procedure, Rule 60(b)(1) allows the court to  
26 set aside the default on the basis of "mistake, inadvertence, surprise, or excusable neglect."  
27  
28



1 As *Rutter* explains: “‘Surprise, inadvertence or excusable neglect’: These terms all boil down  
2 to excusable neglect: i.e., has the moving party shown a reasonable excuse for the default.” *Setting*  
3 *Aside a Default or Default Judgment*, Rutter Group Prac. Guide Fed. Civ. Pro. Before Trial Ch. 6-E  
4 (*Meadows v. Dominican Republic*, 817 F.2d 517, 520 (9th Cir. 1987)).

5 On motion and just terms, the court may relieve a part or its legal representative from a final  
6 judgement, order, or proceeding for mistake, inadvertence, surprise, or excusable neglect. Federal  
7 Rules of Civil Procedure Rule 60(a)(1).” *Setting Aside a Default or Default Judgment*, Rutter Group  
8 Prac. Guide Fed. Civ. Pro. Before Trial Ch. 6-E (citing *United States v. Aguilar*, 782 F.3d 1101, 1105  
9 (9th Cir. 2015)).

10 “‘Judgment by default is a drastic step appropriate only in extreme circumstances; a case  
11 should, whenever possible, be decided on the merits.’ *Falk v. Allen*, 739 F.2d 461, 463 (9th Cir. 1984).  
12 Our rules for determining when a default should be set aside are solicitous towards movants,  
13 especially those whose actions leading to the default were taken without the benefit of legal  
14 representation.” *United States v. Signed Pers. Check No. 730 of Yubran S. Mesle*, 615 F.3d 1085, 1089  
15 (9th Cir. 2010).

16 “Excusable neglect is an equitable concept that takes account of factors such as ‘prejudice, the  
17 length of the delay and impact on judicial proceedings, the reason for the delay, including whether it  
18 was within the reasonable control of the movant, and whether the movant acted in good faith.’”  
19 *Franchise Holding II, LLC v. Huntington Restaurants Grp., Inc.*, 375 F.3d 922, 927 (9th Cir. 2004).

20 As explained below, the reasonable excuse is that the plaintiff did not serve the defendant in  
21 Connecticut, in the manner required by FRBP 7004(b)(9), and the defendant did not receive any notice  
22 of Plaintiff’s complaint.

23 **A. There Was No Conscious Decision by Defendant To Avoid Defending This**  
24 **Complaint. Defendant was without Counsel and was involuntarily Detained in**  
25 **the State of Connecticut without the Ability To Hire Counsel. Defendant Wishes**  
26 **to Prepare a Response and Defend and prays this detainment in another state**  
27 **Sufficient to Set Aside the Default**  
28

1 “The mistake of fact must be reasonable under the circumstances. This usually turns on the  
2 justifiability of defendant's failure to ascertain the correct facts. Relief will not be granted where the  
3 failure to respond reflects the conscious desire to avoid defending the suit.” *Setting Aside a Default or*  
4 *Default Judgment*, Rutter Group Prac. Guide Fed. Civ. Pro. Before Trial Ch. 6-E, 6:158.

5 Here, the defendant did not respond because plaintiff did not serve the defendant in  
6 Connecticut in the manner required by FRBP 7004(b)(9). The defendant did not receive any notice in  
7 the mail at his place of residence in Connecticut in 2023, at the time of the Summons and Complaint  
8 were filed and served at a defective address in California.

9 This Court is empowered to set aside the default solely on the basis of mistake. Defendant’s  
10 prompt action by filing this motion for relief from the default can and should be set aside to allow this  
11 matter to be decided on the merits.

12 **B. Excusable Neglect Also Allows the Default to be Set Aside**

13 Under Rule 60(b)(1), a court may set aside a default judgment for “excusable neglect.” “[T]he  
14 three disjunctive factors used to determine if ‘excusable neglect’ could permit setting aside the [a  
15 defendant’s] default [are]: (1) whether the party seeking to set aside the default engaged in culpable  
16 conduct that led to the default; (2) whether it had no meritorious defense; or (3) whether reopening the  
17 default judgment would prejudice the other party.” *United States v. Aguilar*, 782 F.3d 1101, 1105 (9th  
18 Cir. 2015).

19 Here, first, the party seeking to set aside the default did not engage in culpable conduct that led  
20 to the default. Rather, the declaration of the defendant sets forth that the defendant was residing in the  
21 state of Connecticut near his mother and three children 2023. Family members thereafter involuntarily  
22 committed defendant for medical treatment. Defendant was working at his regular place of  
23 employment in Connecticut when this detainment occurred.

24 Second, the defendant has numerous meritorious defenses, as set forth in the heading below.

25 Third, there is no “default judgment” to be reopened that would prejudice the other party.  
26 Default judgment has been entered.

1 This Court is empowered to hear this adversary on the merits. Defendant respectfully requests  
2 that this Court set aside the default judgment.

3 **C. Defendant Will Present a Meritorious Defense to All Causes of Action in the**  
4 **Complaint**

5 Explained below are the meritorious defenses as relevant to setting aside the default. Defendant is the  
6 manager of J-Pad, LLC since October 2018. Defendant married Jamie Gallian-Pierpont on September  
7 27, 2014, almost ten years ago. Defendant and Jamie Gallian-Pierpont lived together at 4476 Alderport  
8 Drive Huntington Beach, CA as their primary residence from the time they were married in September  
9 2014 until September 11, 2018, in anticipation of the pending sale of the Alderport residence.

10 On or about September 11, 2018, Defendant and Debtor moved together to a 3 yr Lease/Rental  
11 at 5782 Pinon Drive Huntington Beach, CA 92649 until Jamie Gallian-Pierpont previous homestead,  
12 the Alderport home sold. The first buyers cancelled the sale on the same day a ie signed the 3-yr  
13 Lease Agreement. However as fate would have it, another buyer was found and on October 31, 2018,  
14 Alderport was sold to Mr. Randy Nickel. We looked in Rancho Del Rey most of the summer 2018.  
15 On November 1, 2018, we purchased the Space 376 Skyline home from the seller Lisa Ryan at 16222  
16 Monterey Lane as our primary residence. Defendant and Jamie Gallian-Pierpont moved from Pinon  
17 Dr. after cancellation of the 3-year lease to Rancho Del Rey Mobilehome Estates approximately  
18 November 7, 2018 during the painting and clean-up. Defendant lived with the a ie in Unit 376, has  
19 completed a Residency Application with a ie Gallian-Pierpont, and submitted to Rancho Del Rey  
20 Mobilehome Estates and is a Registered Tenant of Unit 376 with a ie. Gallian-Pierpont. Defendant  
21 and a ie Gallian-Pierpont and Mr. Robert McLelland, our Roommate since 2014 at Alderport, were  
22 all issued electronic gate cards by Chris Houser, the Park Operations Manager at the same time as all  
23 other tenants during the change over to the electronic gate system.

24 Defendant returned from Connecticut to California on or about January 16, 2024, defendant  
25 returned to his previous residence with a ie Gallian-Pierpont in Rancho Del Rey Mobilehome  
26 Estates, the address listed on the California Driver's License.

1 Since November 2018, Defendant continue to be Listed as a Tenant, Space 376, at Rancho  
2 Del Rey Mobilehome Estates. Mr. Pierpont was provided with an Electronic Entrance Card to access  
3 the residence, Unit 376. The Security Guard at the front entrance gate at Rancho Del Rey has a readily  
4 available list of all Tenants and Residents and their Space or Unit No. where they reside within the  
5 Park.

6 The Defendant resumed residing with the Debtor in Unit 376, and continues to access his  
7 residence with the electronic gate card issued to him in approximately late 2019, by Chris Houser,  
8 Park Operations Manager for Rancho Del Rey.

9 **Defendant was [not] served with a Copy of the Trustee's Adversary Complaint**

10 The Defendant was [not] served with a Copy of the Trustee's Adversary Complaint filed on  
11 June 30, 2023, Case No. 8:23-ap-01064-SC, Summons or Complaint even though the Trustee knew  
12 from the Debtor during their telephone call on or about February 16, 2024, Mr. Pierpont was doing  
13 unexpectedly quite well in Connecticut and was again a resident going to soon be with Ms. Gallian-  
14 Pierpont in the Rancho Del Rey Park and looking for work, helping with chores since Debtor's friend  
15 and roommate, Mr. Robert McLelland moved out of the room he was renting and staying in while  
16 working local, instead of his permanent residence in Torrance to avoid the long commute to work,  
17 after being served with the Trustee's Adversary Complaint. Mr. McLelland was trying to buy property  
18 and did not want any problems with trying to obtain a loan or have anything attach to his real property.

**TRUSTEE GENERAL ALLEGATIONS IN THE ADVERSARY, RE: RONALD J. PIERPONT**

**A. Plaintiff Trustee's Adversary Complaint alleges at Line 16, No. 33, page 6, Doc 1. Trustee's Complaint.**

*Thereafter, on August 20, 2020, the [Debtor] signed a "Statement to Encumber" that was submitted to the Housing and Community Development ("HCD") to add the Debtor's ex-husband, Ronald J. Pierpont, and J-Pad as lienholders on the certificate of title for the Property (the "Fifth J-Pad Transfer")*

**Defendant Pierpont's response to A. Trustee's allegation Line 16, No. 33, page 6, Doc 1. Trustee's Complaint.**

**Supported by the Declaration of Ronald J. Pierpont** and properly authenticated documents attached, filed CA Dept of HCD,

The Certificate of Title Registered Owner of LBM 1081 is J-SANDCASTLE CO LLC, issued 1/19/2019, by CA Department of Housing and Community Development ("HCD"). The REGISTERED OWNER, J-SANDCASTLE CO, released legal owner interest in the unit to encumber the title (record a lien) in favor of RONALD J. PIERPONT, MEMBER J-PAD LLC. Executed on 08/20///2020 at Huntington Beach, CA

**CD STATEMENT OF FACTS** Decal LBM 10 1 The Original a e t add legal ne a l t in the ail Cu t e ent h t c ie the a licati n Re e entati e Sandcastle C LLC, a ie allian tate that Legal O ne i int R nald ie nt ad ad, LLC at the a e add e l 222 M nte ey Ln untngt n Beach, CA 2 Executed n 2/22/2021 at Sac a ent , CA by Rebecca O'Laughin **Declaration of Ronald J. Pierpont, EXHIBIT 1.** A true and correct copy of the REGISTRATION CARD – LEGAL OWNER COPY INFORMATION ONLY, issued by CA Department of Housing and Community Development was sent through U.S. Mail to Ronald J. Pierpont. **Declaration of Ronald J. Pierpont, EXHIBIT 2**

**B. Plaintiff's Trustee's Adversary Complaint states at Line 19, No. 34, page 6, Doc 1. Trustee's Complaint.**

*Thereafter, as of February 24, 2021, the certificate of title to the Property reflected that Mr. Pierpont **and** (sic) J-Pad were the "legal owners" (i.e., the lienholders) on the property.*

1 *Pierpont and (sic) J-Pad were the “legal owners” (i.e., the lienholders) on the*  
2 *property.*

3  
4 **Defendant Pierpont’s response to B.** Trustee’s allegation Line 19, No. 34, page 6, Doc 1.  
5 Trustee’s Complaint.

6 The CD Certificate of Title and Registration Card issued 2/24/2021 by HCD, both reflect  
7 the: Legal Owners as *Tenants in Common [or] not [and]*, as the Trustee’s complaint incorrectly  
8 alleges. A true and correct copy of the 2/24/2021 REGISTRATION CARD – LEGAL OWNER  
9 COPY INFORMATION ONLY, issued by CA Department of Housing and Community  
10 Development was sent through U.S. Mail to Ronald J. Pierpont list the true facts as follows:

11 **Legal Owner(s)**

12 **RONALD J PIERPONT**

13 **JPAD, LLC**

14 **Tenants in Common Or**

15 16222 MONTEREY LANE SPACE 376

16 HUNTINGTON BEACJ, CA 02649

17 Lien Perfected On: 08/20/20 11:58:00 **Declaration of Ronald J. Pierpont, EXHIBIT 3**

18 **C.** Plaintiff’s Trustee’s Adversary Complaint states at **Line 21, No. 35, page 6, Doc 1. Trustee’s**  
19 **Complaint.**

20 *On or about July 9, 2021, however, Mr. Pierpont submitted a signed “Lien Satisfied”*  
21 *form to the HCD removing Mr. Pierpont and J-Pad as the lienholders on the Property.*

22  
23 **Defendant Pierpont’s response to C.** to Trustee’s Adversary Complaint at **Line 21, No. 35, page**  
24 **6, Doc 1. Trustee’s Complaint.**

25 A True and Correct copy of HCD Lien Satisfied Form executed July 9, 2021, by Ronald J. Pierpont  
26 sent by U.S. Mail to Sacramento HCD is attached.

27 **Declaration of Ronald J. Pierpont, EXHIBIT 4**

D. Plaintiff's Trustee's Adversary Complaint states at **Line 23, No. 36, page 6, Doc 1. Trustee's Complaint.**

*Thereafter, as of August 3, 2021, the certificate of title to the Property did not reflect any "legal owners" (i.e., lienholders) on the property.*

A True and Correct copy of Department of Housing and Community Development ("HCD") Title Search Date Printed: July 27, 2021, Decal # LBM 1081 is attached.

**Declaration of Ronald J. Pierpont, EXHIBIT 5**

**Note:**

Not all information on the 7/27/21 Title Search is reflected here, just the relevant portions.  
See Exhibit 5 for Full Title Search.

**Title Search**

Date Printed: July 27, 2021

Decal # LBM 1081

Registered Owner:

JAMIE LYNN GALLIAN  
16222 MONTEREY LN. SPACE 376  
HUNTINGTON BEACH, CA 92649

Last Title Date: 02/24/2021

Last Reg Card: Pending Reg Card

Sale/Transfer Info: Price \$0.00 Transferred on 02/25/2021

Legal Owner: JPAD LLC

RONALD J. PIEPRONT

Tenants in Common Or

16222 MONTEREY LANE SPACE 376

HUNTINGTON BEACH, CA 02649

**Lien Perfected On:** 02/25/2021 10:11:00

**State of California Department of Housing and Community Development**  
**STATEMENT OF FACTS**

Decal LBM 1081

I/We, the undersigned, hereby state: I spoke with Jamie Gallian and she states the unit should be registered as Jamie Gallian as the sole registered owner. The lien has been satisfied and there is no legal owner at this time. Jamie advised the County and was told there was no need to revise the Tax Clearance Certificate.

Executed on July 28, 2021, at Sacramento, CA

Signed by Rebecca O’Laughlin, Program Tech II,

A True and Correct copy of HCD Certificate of Title and Registration Card issued August 3, 2021,

**Declaration of Ronald J. Pierpont, EXHIBIT 5 HCD Certificate of Title**

**Declaration of Ronald J. Pierpont, EXHIBIT 6 HCD Registration Card**

There appear to be numerous defenses, both factual and legal, in this case. Accordingly, Defendant respectfully requests that the entry of default and default judgment be set aside.

**D. The Plaintiff Failed to Serve Defendant as Required by Law]**

Under Federal Rules of Bankruptcy Procedure, Rule 7012(b): “Rule 12(b)–(i) F.R.Civ.P. applies in adversary proceedings.” In turn, under Federal Rules of Civil Procedure, Rule 12(b)(5), “a party may assert the following defenses by motion...insufficient service of process.” As it relates to service of process, FRBP 7004(a)(1) provides that “Rule 4...(m) F.R.Civ.P. applies in adversary proceedings.”

In turn Federal Rules of Bankruptcy Procedure, Rule 7004(b)(9) provides that, where service is to be made “Upon the debtor,” service is made “by mailing a copy of the summons and complaint to the debtor at the address shown in the petition or to such other address as the debtor may designate in a filed writing.”

As *Rutter* explains: “When service of process is properly challenged, the party on whose behalf service was made (Jeffrey Golden, Chapter 7 Trustee as plaintiff in the adversary action has the burden



1 to establish its validity. [See *Mann v. Castiel* (DC Cir. 2012) 681 F3d 368, 373].” *Challenging*  
2 *Defective Service*, Rutter Group Prac. Guide Fed. Civ. Pro. Before Trial Ch. 5-I, 5:348. When “the  
3 defect in service is established on the face of the return,” no further evidence is required by the  
4 defendant to establish the defect. *Id.* at 5:350 (citing *In re Med-Atlantic Petroleum Corp.*, 233 BR  
5 644, 662 (BC SD NY 1999); *Vázquez-Robles v. CommoLoCo, Inc.*, 757 F3d 1, 8 (1st Cir. 2014) —  
6 defendant's documentary evidence established “beyond hope of contradiction” that plaintiff's  
7 attempted service “was insufficient to hale the defendant into court”).

8  
9 Rule 7004 requires that notice be “reasonably calculated, under all the circumstances, to  
10 apprise interested parties of the pendency of the action and afford them an opportunity to present their  
11 objections.” *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306, 314, 70 S.Ct. 652, 94 L.Ed.  
12 865 (1950). And “[i]f the notice requirement of the due process clause is not satisfied, the order is  
13 void.” *In re Ex-Cel Concrete Co.*, 178 B.R. 198, 203 (9th Cir. BAP 1995); likewise, *In re Loloe*, 241  
14 B.R. 655, 661 (9th Cir. BAP 1999) and *In re Villar*, 317 B.R. 88, 94 (9th Cir. BAP 2004).

15 In this case, service was sent to an address shown on the Debtors petition, However, the  
16 Debtor was not aware that the Defendant was not living at the last known address and debtor was not  
17 aware that Defendant Ronald Pierpont left the state and returned to Connecticut to deal with a drug  
18 addiction with the help of his family members. Defendant was ashamed and did not tell anyone he left  
19 for Connecticut in mid 2023.

20 As a court in the Central District of California explained, “frankly, a bankruptcy attorney  
21 should readily know how to serve in accordance with FRBP 7004. Since the information required to  
22 satisfy FRBP 7004(b)(9) was readily available, compliance was a simple task...

23  
24 The unintentional failure to comply alone is not a good enough excuse for this court to ignore  
25 plaintiffs’ lack of compliance with FRBP 7004.” *In re Bloomingdale*, 137 B.R. 351, 354–55 (Bankr.  
26 C.D. Cal. 1991). The court found that, “[w]hen service is not made within the [90]–day period and no  
27 good cause is demonstrated for the failure to comply, the complaint should be dismissed. Since  
28

1 plaintiffs failed to serve this defendant properly within the [90]–day period and no good cause was  
2 shown, the complaint is dismissed.”

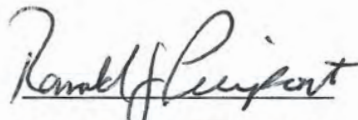
3 Defendant respectfully requests that this Court set aside the Default Judgement entered May  
4 10.2024.

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**III. CONCLUSION**

For the reasons set forth above, Defendant Ronald J. Pierpont respectfully requests that this Court set aside the entry of default and, if necessary, set aside any default judgment under FRCP 55(c) and 60(b)(1).

DATED: August 13, 2024



RONALD J. PIERPONT

Defendant in Pro Per

**IV. DECLARATION OF RONALD J. PIERPONT**

I, RONALD J. PIERPONT, declare:

1. I am the defendant in the above-referenced adversary. The facts set forth herein are of my own personal knowledge and if sworn I could and would testify competently thereto.

2. I have suffered from a serious drug addiction for most of my life. For many years I was able to control it and hide it from the my wife, Jamie Gallian-Pierpont who I was lucky enough to marry on September 27, 2014, almost 10 years ago.

3. Jamie Gallian-Pierpont was a happy, 22-year flight attendant with United Airlines when we met and married, until August 5, 2018, when I witnessed a Gables HOA Board Member in the previous community we lived in on Alderport, push my wife to the ground and strike her wrists. As I saw this incident driving in my car, I saw my wife stand, I assumed she was okay. I continued to drive out of the community to work. What happened next changed our life forever. The attacker wo was subsequently arrested by Huntington Beach Police for battery, pushed a heavy city trash can that landed on my wife's left foot, causing a severe crushing injury, severe nerve damage, and disfigurement. My wife never returned to her career as a 22 year flight attendant and the financial burden now with only one income, caused me to spiral downward over the next few years. We have lived together and apart at different times for the past 10 years. Our new marriage suffered greatly.

4. The addresses I have resided for long periods of time with the Debtor include 4476 Alderport Drive Unit 53 from 9/15/2014-9/11/2018; 5782 Pinon Drive, from 9/11/2018-11/7/2018; and 16222 Monterey Lane Unit 376, 11/7/2018. Periodically I would live on a boat in Seal Beach working for the owner. There were other periods of time I was not living at the Huntington Beach residence with Jamie.

5. Before leaving California in September 2023, I was living on the boat in Seal Beach, CA. I was doing work on the boat in exchange for a place to sleep. Jamie Lynn Gallian-Pierpont does not tolerate or understand drug addiction, and how easy it is to slip back into the addiction. I was not permitted to reside with Debtor at any-time when suffering paranoia and in delusional states. She tried several times to get me into recovery programs. I finally hit rock bottom and could not stand the

1 paranoia in my head, I reached out to my family in Connecticut and left California, leaving all my  
2 personal items behind. I didn't tell a sole, not even the person who would never turn their back on me,  
3 my ex-spouse, Jamie Lynn Gallian-Pierpont.

4 6. At no time during this adversary proceeding which I understand began on or about June  
5 30, 2023, have I been contacted at the address printed on my California Driver's License, 16222  
6 Monterey Lane Unit 376 Huntington Beach, CA 92649, before or after I returned to California from  
7 Connecticut after I sought help for a severe drug addiction, subsequently resulting in an involuntary  
8 detainment 5150 hold for over 30 days. After I was released from the involuntary 5150, I stayed in  
9 Connecticut, held a full-time job and mended a broken relationship with family members through the  
10 Christmas holiday.

11 7. In late December 2023, after Christmas, I contacted Jamie Lynn Gallian and asked if  
12 she has a spare room I could stay in until I was able to sustain employment and purchase a car. I  
13 returned to California on or about mid January 2024, and have resided with the debtor ever since using  
14 my same electronic gate card to enter Rancho Del Rey Mobilehome Estates where I am listed as a  
15 Tenant. I confirmed with the Security Gate Officer, I was still listed as a Tenant at Unit 376 since mid  
16 2020.

17 8. I became aware of this action in or about July 10, 2024, after Debtor came back from  
18 HCD Riverside learning about a May 2024, the Trustee's attorney filed some Application with HCD.

19 9. Jamie used her PACER account and printed the Register of Actions of this action 8:23-  
20 ap-01064-SC. Debtor notified me of the Default Judgment entered against me entered May 10, 2024.

21 10. I have not received anything in the U.S. Mail from Jeffrey Golden, Chapter 7 Trustee,  
22 or the Plaintiff's counsel at the address listed on my California Drivers License 16222 Monterey Lane  
23 Unit 376, Huntington Beach, CA 92649.

24 11. I asked Jamie Gallian-Pierpont if she received any inquiry from the Plaintiff, Chapter 7  
25 Trustee, Jeffrey Golden, notwithstanding the Debtor's petition reported we lived together in a  
26 Community Property state within the last 8 years.

1           12.     I declare under penalty of perjury under the laws of the United States that the foregoing  
2 is a true and correct account of my absence from California.

3           13.     I am clean and thankful my Connecticut family members had the courage to intervene  
4 and place me on a involuntary 5150. I am thankful Jamie Gallian-Pierpont still supports me on my  
5 road to permanent recovery.

6  
7 **EXHIBITS FOLLOW ON NEXT PAGE.**

1 14. A True and Correct Copy of Certificate of Title Registered Owner of LBM 1081 is J-  
2 SANDCASTLE CO LLC, issued 1/19/2019, by CA Department of Housing and Community  
3 Development (“HCD”). **Declaration of Ronald J. Pierpont EXHIBIT 1**

4 15. A True and Correct Copy of the REGISTRATION CARD – LEGAL OWNER COPY  
5 INFORMATION ONLY, issued by CA Department of Housing and Community Development sent  
6 through U.S. Mail to Ronald J. Pierpont. **Declaration of Ronald J. Pierpont, EXHIBIT 2**

7 16. A true and correct copy of the 2/24/2021 REGISTRATION CARD – LEGAL OWNER  
8 COPY INFORMATION ONLY, issued by CA Department of Housing and Community Development  
9 was sent through U.S. Mail to Ronald J. Pierpont list the true facts as follows:

10 **Legal Owner(s)**

11 **RONALD J PIERPONT**

12 **J-PAD, LLC**

13 **Tenants in Common Or**

14 16222 MONTEREY LANE SPACE 376

15 HUNTINGTON BEACJ, CA 02649

Lien Perfected On: 08/20/20 11:58:00

16 **Declaration of Ronald J. Pierpont, EXHIBIT 3**

17 17. A True and Correct Copy of HCD Lien Satisfied Form executed July 9, 2021, by  
18 Ronald J. Pierpont sent through U.S. Mail to Sacramento CA Department of Housing and Community  
19 Development is attached. **Declaration of Ronald J. Pierpont, EXHIBIT 4**

20 18. A True and Correct copy of the Department of Housing and Community Development  
21 (“HCD”) **Title Search** Date Printed: July 27, 2021, Decal # LBM 1081 is attached.

22 **Declaration of Ronald J. Pierpont, EXHIBIT 5**

23 19. A True and Correct copy of HCD Certificate of Title issued August 3, 2021, is attached.

24 **Declaration of Ronald J. Pierpont, EXHIBIT 5 HCD Certificate of Title.**

25 20. A True and Correct copy of HCD Registration Card issued August 3, 2021, **Declaration**  
26 **of Ronald J. Pierpont, EXHIBIT 6 HCD Registration Card**

27 21. 2/22/2021 **STATEMENT OF FACTS** - REBECCA O'LAUGHLIN PROGRAM TECH

28 22. 7/27/2021 **HCD TITLE SEARCH** LBM 1081

23. 7/28/2021 **STATEMENT OF FACTS** - REBECCA O'LAUGHLIN PROGRAM TECH

-18-

1 I declare under penalty of perjury the foregoing to be true and correct.

2 Executed this 13th<sup>t</sup> day of August, 2024 at Huntington Beach, California.

3  
4 

5 RONALD J. PIERPONT

6 Defendant, In pro per  
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RONALD JOSEPH PIERPONT  
JAMIE LYNN GALLIAN  
4476 ALDERPORT DRIVE  
HUNTINGTON BEACH, California 92649

## CERTIFICATE OF MARRIAGE

STATE OF HAWAII  
DEPARTMENT OF HEALTH



CERTIFICATE NUMBER  
151 2014-018807

NAME OF GROOM  
RONALD JOSEPH PIERPONT

DATE OF BIRTH  
JUNE 12, 1964

GROOM'S PLACE OF BIRTH  
NEW HAVEN, CONNECTICUT

GROOM'S DECLARED MIDDLE NAME(S)  
JOSEPH

FATHER'S FULL NAME  
RICHARD JAMES PIERPONT

FATHER'S STATE OR COUNTRY OF BIRTH  
CONNECTICUT

GROOM'S DECLARED SURNAME  
PIERPONT

MOTHER'S MAIDEN NAME  
MARY LOUISE DeBIASE

MOTHER'S STATE OR COUNTRY OF BIRTH  
CONNECTICUT

NAME OF BRIDE  
JAMIE LYNN GALLIAN

DATE OF BIRTH  
NOVEMBER 16, 1962

BRIDE'S PLACE OF BIRTH  
LYNWOOD, CALIFORNIA

BRIDE'S DECLARED MIDDLE NAME(S)  
LYNN

FATHER'S FULL NAME  
THOMAS JEFFERSON TOMA

FATHER'S STATE OR COUNTRY OF BIRTH  
OKLAHOMA

BRIDE'S DECLARED SURNAME  
PIERPONT

MOTHER'S MAIDEN NAME  
PATRICIA MARY ROWE

MOTHER'S STATE OR COUNTRY OF BIRTH  
ILLINOIS

DATE OF MARRIAGE  
SEPTEMBER 27, 2014

PLACE OF CEREMONY  
CHARLEY YOUNG BEACH

COUNTY ISLAND  
MAUI MAUI

DATE ACCEPTED BY STATE REGISTRAR  
10/01/2014

PERFORMER  
WHEELER, KOLLEEN

OHSM 5.3 (Rev.2/13) This copy serves as prima facie evidence of the fact of marriage in any court proceeding. [HRS 572-13(c), 338-13(b)]

**ANY ALTERATIONS INVALIDATE THIS CERTIFICATE**



OCT 10 2014

I CERTIFY THIS IS A TRUE COPY OR  
ABSTRACT OF THE RECORD ON FILE IN  
THE HAWAII STATE DEPARTMENT OF HEALTH

*Alvin T. Onaka, Ph.D.*  
STATE REGISTRAR



**CALIFORNIA** USA **DRIVER LICENSE**

**DL F8036131**

**EXP 06/12/2019** **CLASS C**  
**END NONE**

**LN PIERPONT**  
**FN RONALD JOSEPH**  
4476 ALDERPORT DR  
HUNTINGTN BCH, CA 92649

**DOB 06/12/1964** **RSTR NONE**

**SEX M** **HAIR BRN** **EYES BRN**  
**HGT 6'-00"** **WGT 205 lb**

**DD 08/28/201461113/DDFD/19** **ISS 08/28/2014**

*Ronald Joseph Pierpont*



Ronald J Pierpont

**California** USA **DRIVER LICENSE** FEDERAL LIMITS APPLY

DL **F8036131** CLASS C  
EXP **06/12/2029** END NONE

LN **PIERPONT**  
FN **RONALD JOSEPH**  
16222 MONTEREY LANE SPC 376  
HUNTINGTON BH, CA 92649

DOB **06/12/1964** 06121964  
RSTR NONE

SEX M HAIR BRN EYES BRN  
HGT 6'-00" WGT 295 lb ISS  
DD 08/28/2014611RB/CCFDZ9 06/11/2024



**STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
REGISTRATION CARD**

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name 90002 SKYLINE HOMES INC	Trade Name CUSTOM VILLA	Model	DOM 05/29/2014	DFS 07/28/2014	RY	Exp. Date
Serial Number AC7V710394GB AC7V710394GA	Label/Insignia Number PFS1130281 PFS1130282	Weight 22,383 25,068	Length 56' 60'	Width 15' 2" 15' 2"	Issued Jan 19, 2019	

**Addressee**

J-SANDCASTLE CO LLC  
16222 MONTEREY LANE ROOM 376  
HUNTINGTON BEACH, CA 92649



**Registered Owner(s)**

J-SANDCASTLE CO LLC  
16222 MONTEREY LANE ROOM 376  
HUNTINGTON BEACH, CA 92649

**Situs Address**

16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

\*\*\*\*\*  
**ATTENTION OWNER:**

THIS IS THE REGISTRATION CARD FOR THE  
UNIT DESCRIBED ABOVE. PLEASE KEEP THIS  
CARD IN A SAFE PLACE WITHIN THE UNIT.

**INSTRUCTIONS FOR RENEWAL:**

REGISTRATION FOR THIS UNIT EXPIRES ON THE  
DATE INDICATED ABOVE IN THE BOX LABELED  
"Exp. Date". THERE ARE SUBSTANTIAL  
PENALTIES FOR DELINQUENCY. IF YOU DO NOT  
RECEIVE A RENEWAL NOTICE WITHIN 10 DAYS  
PRIOR TO THE EXPIRATION DATE, CONTACT  
H.C.D. FOR RENEWAL INSTRUCTIONS.  
\*\*\*\*\*

**IMPORTANT**

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE  
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

DTN: 10670236

01192019-1

**STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
CERTIFICATE OF TITLE**

**Manufactured Home**

**Decal: LBM1081**

<b>Manufacturer ID/Name</b> 90002 SKYLINE HOMES INC	<b>Trade Name</b> CUSTOM VILLA	<b>Model</b> ..	<b>DOM</b> 05/29/2014	<b>DFS</b> 07/28/2014	<b>RY</b>
<b>Serial Number</b> AC7V710394GB AC7V710394GA	<b>Label/Insignia Number</b> PFS1130281 PFS1130282	<b>Weight</b> 22,383 25,068	<b>Length</b> 56' 60'	<b>Width</b> 15' 2" 15' 2"	<b>Issued</b> Jan 19, 2019

**Addressee**

J-SANDCASTLE CO LLC  
16222 MONTEREY LANE ROOM 376  
HUNTINGTON BEACH, CA 92649

**Registered Owner(s)**

J-SANDCASTLE CO LLC  
16222 MONTEREY LANE ROOM 376  
HUNTINGTON BEACH, CA 92649

**Situs Address**

16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**IMPORTANT**

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE  
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

DTN: 10670236

01192019-2



STATE OF CALIFORNIA  
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF CODES AND STANDARDS  
REGISTRATION AND TITLING PROGRAM



**STATEMENT TO ENCUMBER**

**SECTION I. DESCRIPTION OF UNIT**

This unit is a (check one):

☒ Manufactured Home, Mobilehome, Multifamily Manufactured Home ☐ Commercial Modular ☐ Truck Camper ☐ Floating Home

The Decal (License) Number(s) is: LBM1081

The Trade Name is: SKYLINE HOMES CUSTOM VILLA

The Serial Number(s) is: ACTV710394GB/GA

**SECTION II. LEGAL OWNER INFORMATION**

I/We are releasing legal owner interest in the above-described unit to encumber the title (record a lien) in favor of:

Ronald J. Pierpont, Member J Pad LLC  
(Name of New Legal Owner)

Address: 16222 MONTEREY LN. #376 HUNTINGTON BEACH, CA 92649  
Street Address or P.O. Box City State Zip

**SECTION III. CERTIFICATION**

I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 8/20/2020 at HUNTINGTON BEACH, CALIFORNIA  
Date City State

Signature of each registered owner:

Printed name of each registered owner:

Jamie L. Gallian, Member

J-SANDCASTLE CO LLC JAMIE L. GALLIAN, MEMBER

Address: 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649  
Street Address or P.O. Box City State Zip

## ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
County of ORANGE

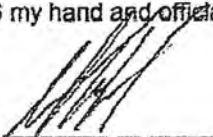
On AUG, 28, 2020 before me, ALEX MAJDOUR NOTARY PUBLIC  
(insert name and title of the officer)

personally appeared JAMIE LYNN GALLIAN  
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

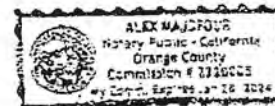
I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature



(Seal)





STATE OF CALIFORNIA  
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF CODES AND STANDARDS  
REGISTRATION AND TITLING PROGRAM



**STATEMENT OF FACTS**

This unit is a: ☒ Manufactured Home / Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

Decal (License) No.(s):  LBM 1081	Trade Name:	Serial No.(s):
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I/We, the undersigned, hereby state:

The original paperwork to add legal owner was lost in the mail. Customer sent photocopies of the application. Representative for J-Sandcastle LLC, Jamie Gallian states the legal owner is Joint Ronald J. Pierpont and J Pad LLC at the same address: 16222 Monterey Ln # 376 Huntington Beach CA 92649

I/We further agree to indemnify and save harmless the Director of the Department of Housing and Community Development, State of California, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above-described unit in California, or from issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury that the foregoing is true and correct.

Executed on 02/22/2021 at Sacramento CA  
Date City State

Signature(s): <u>Rebecca O'Loughlin</u>	Printed name(s): <u>Rebecca O'Loughlin, Program Tech III</u>
--	---

Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_



**STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
CERTIFICATE OF TITLE**

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name 90002 SKYLINE HOMES INC	Trade Name CUSTOM VILLA	Model		DOM 05/29/2014	DFS 07/28/2014	RV
Serial Number AC7V710394GB AC7V710394GA	Label/Insignia Number PFS1130281 PFS1130282	Weight 22,383 25,068	Length 56' 60'	Width 15' 2" 15' 2"	Issued Feb 24, 2021	

**Addressee**

RONALD J PIERPONT  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**Registered Owner(s)**

J-SANDCASTLE CO LLC  
16222 MONTEREY LANE ROOM 376  
HUNTINGTON BEACH, CA 92649

**Situs Address**

16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**Legal Owner(s)**

RONALD J PIERPONT  
JPAD LLC  
Tenants in Common Or  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

Lien Perfected On: 08/20/20 11:58:00

**IMPORTANT**

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE  
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.



**STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT**  
**REGISTRATION CARD**

Manufactured Home

**Decal: LBM1081**

Manufacturer ID/Name	Trade Name	Model	DOM	DFS	RV	Exp. Date
90002 SKYLINE HOMES INC	CUSTOM VILLA		05/29/2014	07/28/2014		
Serial Number	Label/Insignia Number	Weight	Length	Width	Issued	
AC7V710394GB	PFS1130281	22,383	56'	15' 2"	Feb 24, 2021	
AC7V710394GA	PFS1130282	25,068	60'	15' 2"		

**Addressee**

RONALD J PIERPONT  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649



**Registered Owner(s)**

J-SANDCASTLE CO LLC  
16222 MONTEREY LANE ROOM 376  
HUNTINGTON BEACH, CA 92649

**Situs Address**

16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**Legal Owner(s)**

RONALD J PIERPONT  
JPAD LLC  
Tenants in Common Or  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**LEGAL OWNER COPY  
INFORMATION ONLY**

Lien Perfected On: 08/20/20 11:58:00

**IMPORTANT**

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE  
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

DTN: 12153896

02242021 - 1

**STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
REGISTRATION CARD**

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name 90002 SKYLINE HOMES INC	Trade Name CUSTOM VILLA	Model	DOM 05/29/2014	DFS 07/28/2014	RY	Exp. Date
Serial Number AC7V710394GB AC7V710394GA	Label/Insignia Number PFS1130281 PFS1130282	Weight 22,383 25,068	Length 56' 60'	Width 15' 2" 15' 2"	Issued Aug 03, 2021	

**Addressee**

JAMIE LYNN GALLIAN  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649



**Registered Owner(s)**

JAMIE LYNN GALLIAN  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**Situs Address**

16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

\*\*\*\*\*

**ATTENTION OWNER:**

THIS IS THE REGISTRATION CARD FOR THE  
UNIT DESCRIBED ABOVE. PLEASE KEEP THIS  
CARD IN A SAFE PLACE WITHIN THE UNIT.

**INSTRUCTIONS FOR RENEWAL:**

REGISTRATION FOR THIS UNIT EXPIRES ON THE  
DATE INDICATED ABOVE IN THE BOX LABELED  
"Exp. Date". THERE ARE SUBSTANTIAL  
PENALTIES FOR DELINQUENCY. IF YOU DO NOT  
RECEIVE A RENEWAL NOTICE WITHIN 10 DAYS  
PRIOR TO THE EXPIRATION DATE, CONTACT  
H.C.D. FOR RENEWAL INSTRUCTIONS:

\*\*\*\*\*

I hereby certify that this copy is a true and correct copy of  
the original document on file with the Department of  
Housing & Community Development.

A handwritten signature in black ink, likely belonging to an official of the Department of Housing and Community Development, is written over a horizontal line.

Signature

**IMPORTANT**

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE  
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

DTN: 12313525

08032021 - 1

**STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
CERTIFICATE OF TITLE**

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name	Trade Name	Model		DOM	DFS	RY
90002 SKYLINE HOMES INC	CUSTOM VILLA			05/29/2014	07/28/2014	
Serial Number	Label/Insignia Number	Weight	Length	Width	Issued	
AC7V710394GB	PFS1130281	22,383	56'	15' 2"	Aug 03, 2021	
AC7V710394GA	PFS1130282	25,068	60'	15' 2"		

**Addressee**

JAMIE LYNN GALLIAN  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**Registered Owner(s)**

JAMIE LYNN GALLIAN  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**Situs Address**

16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

I hereby certify that this copy is a true and correct copy of  
the original document on file with the Department of  
Housing & Community Development.



Signature

**IMPORTANT**

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE  
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

DTN: 12313525

08032021 - 2



STATE OF CALIFORNIA  
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF CODES AND STANDARDS  
REGISTRATION AND TITLING PROGRAM



**LIEN SATISFIED**

**SECTION I. DESCRIPTION OF UNIT**

This unit is a:

☒ Manufactured Home/Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

The Decal (License) No.(s) of the unit is: LBM1081

The Trade Name of the unit is: CUSTOM VILLA

The Serial No.(s) of the unit is: AC7V710394GB/AC7V710394GA

**SECTION II. DEBTOR(S) NAME(S)**

Name of Debtor(s): J-SANDCASTLE CO, LLC

**SECTION III. LIENHOLDER'S CERTIFICATION**

This is to certify that our/my lien in the name(s) of the debtor(s) shown above against the described unit has been fully satisfied and has not been assigned to any other party.

I/We certify under penalty of perjury that the foregoing is true and correct.

Print or Type Name of Legal Owner or Jr. Lienholder (Lender):

J-PAD LLC or RONALD J. PIERPONT

Signature of Legal Owner, Jr. Lienholder (Lender) or their Authorized Agent:

Ronald J Pierpont

Date 7/9/2021

Address 16222 MONTEREY LN. #376 HUNTINGTON BEACH, CA 92649  
Street Address or P.O. Box City State Zip

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF CODES AND STANDARDS**Title Search**

Date Printed: Jul 27, 2021

Decal #:	LBM1081	Use Code:	SFD
Manufacturer:	SKYLINE HOMES INC	Original Price Code:	BVH
Tradename:	CUSTOM VILLA	Rating Year:	
Model:		Tax Type:	LPT
Manufactured Date:	05/29/2014	Last ILT Amount:	
Registration Exp:		Date ILT Fees Paid:	
First Sold On:	07/28/2014	ILT Exemption:	NONE

Serial Number	HUD Label / Insignia	Length	Width
AC7V710394GA	PFS1130282	60'	15' 2"
AC7V710394GB	PFS1130281	56'	15' 2"

**Record Conditions:**

- An application for title or registration change is pending with the department. For information regarding this application, please call 1-800-952-8356 and request to speak with a customer representative.

**Registered Owner:**

JAMIE LYNN GALLIAN  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**Last Title Date:** 02/24/2021

**Last Reg Card:** Pending Reg Card

**Sale/Transfer Info:** Price \$.00 Transferred on 02/25/2021

**Situs Address:**

16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649  
Situs County: ORANGE

**Legal Owner:**

JPAD LLC  
RONALD J PIERPONT  
Tenants in Common Or  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**Lien Perfected On:** 02/25/21 10:11:00

**Title Searches:**

JANINE JASSO  
PO BOX 370161  
EL PASO, TX 79937

**Title File No:** LBM1081

STATE OF CALIFORNIA  
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF CODES AND STANDARDS  
REGISTRATION AND TITLING PROGRAM



**STATEMENT OF FACTS**

This unit is a: ☒ Manufactured Home / Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

Decal (License) No.(s):  LBM1081	Trade Name:	Serial No.(s):
--	-------------	----------------

I/We, the undersigned, hereby state:

*I spoke with Jamie Gallian and she states the unit should be registered as Jamie Gallian as sole registered owner. The lien has been satisfied and there is no legal owner at this time. Jamie advised the county and was told there was no need to revise the Tax Clearance certificate.*

I/We further agree to indemnify and save harmless the Director of the Department of Housing and Community Development, State of California, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above-described unit in California, or from issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury that the foregoing is true and correct.

Executed on 7/28/21 at Sacramento, CA  
Date City State

Signature(s): <i>Fabiana M. O'Loughlin</i>	Printed name(s): <i>Fabiana M O'Loughlin, Program Tech III</i>
---	---

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_



LBM1081

Manufacturer ID/Name	T
90002 SKYLINE HOMES INC	C
Serial Number	L
AC7V710394GB	PI
AC7V710394GA	PI

**Addressee**

J-PAD LLC  
 21742 ANZA AVE  
 TORRANCE, CA 90503

**Registered Owner(s)**

JAMIE LYNN GALLIAN  
 16222 MONTEREY LN SPA  
 HUNTINGTON BEACH, CA

**Situs Address**

16222 MONTEREY LN SPA  
 HUNTINGTON BEACH, CA

**Legal Owner(s)**

J-PAD LLC  
 21742 ANZA AVE  
 TORRANCE, CA 90503

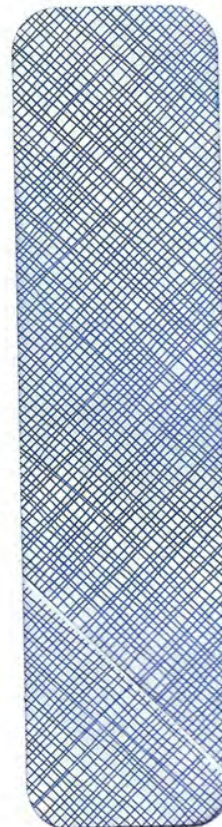
Lien Perfected On: 01/1

FIRST-CLASS MAIL  
 PRSRT  
**\$000.46**  
 neopost®  
 08/12/2021  
 US POSTAGE  
 ZIP 95633  
 041M12251094



RETURN  
 SERVICE  
 REQUESTED

DEPARTMENT OF HOUSING AND  
 COMMUNITY DEVELOPMENT  
 DIVISION OF CODES AND STANDARDS  
 REGISTRATION & TITLING PROGRAM  
 P.O. BOX 277820  
 SACRAMENTO CA 95827-7820



014  
 2021  
 RY

100 C-10044 90503

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE  
 DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE  
 CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.



STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

CERTIFICATE OF TITLE

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name	Trade Name	Model		DOM	DFS	RY
90002 SKYLINE HOMES INC	CUSTOM VILLA			05/29/2014	07/28/2014	
Serial Number	Label/Insignia Number	Weight	Length	Width	Issued	
AC7V710394GB	PFS1130281	22,383	56'	15' 2"	Aug 12, 2021	
AC7V710394GA	PFS1130282	25,068	60'	15' 2"		

**Addressee**

J-PAD LLC  
21742 ANZA AVE  
TORRANCE, CA 90503

**Registered Owner(s)**

JAMIE LYNN GALLIAN  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**Situs Address**

16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**Legal Owner(s)**

J-PAD LLC  
21742 ANZA AVE  
TORRANCE, CA 90503

Lien Perfected On: 01/14/19 15:22:00

**IMPORTANT**

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.



STATE OF CALIFORNIA  
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF CODES AND STANDARDS  
REGISTRATION AND TITLING PROGRAM



STATEMENT OF ERROR OR ERASURE

SECTION I. DESCRIPTION OF UNIT

The Decal (License) Number(s) of the unit is:

LBM 1081

The Trade Name of the unit is:

SKY Line Custom Villa

The Serial Number(s) of the unit is:

AC1V710394 GO/CA

SECTION II. STATEMENT OF ERROR

The name or information appearing on, erased from, crossed through or whited-out on line Current COT 8/21  
or other area of the was inaccurate information submitted on 8/6/2021 to HCD.

Enter name of document or form

was entered in error and has no bearing on the ownership of the unit. The name or information should not be part of the ownership record.

In the space provided below, enter the reason for the error or erasure:

The original COT issued 8/3/2021 reflected Line 1 signed  
submitted on 7/9/2021 by Ronald Purpore (Husband)  
releasing my & all lines perfected 8/20/2020 on COT  
on behalf of Ronald Purpore & J-Pod LLC  
Janie William believed that the COT stated "AND"  
instead of "OR" as reflected in HCD Program Fee Statement of  
Fee Executed 2/22/21 by Rebecca O'Laughlin.

SECTION III. CERTIFICATION

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 16th August 2024 at Pasadena, Ca

Date

City

State

Signature Janie William

Address 16222 Monterey CA Sp376 Huntington

Address or P.O. Box

City

State

Zip 92049



STATE OF CALIFORNIA  
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF CODES AND STANDARDS  
REGISTRATION AND TITLING PROGRAM



*Page 72*  
**STATEMENT OF ERROR OR ERASURE**

**SECTION I. DESCRIPTION OF UNIT**

The Decal (License) Number(s) of the unit is:

*L Bm 1081*

The Trade Name of the unit is:

*SKYLINE Custom Villa*

The Serial Number(s) of the unit is:

*AC TV 710394 GB/GBA.*

**SECTION II. STATEMENT OF ERROR**

The name or information appearing on, erased from, crossed through or whited-out on line \_\_\_\_\_  
or other area of the \_\_\_\_\_

*Enter name of document or form*

was entered in error and has no bearing on the ownership of the unit. The name or information should not be part of the ownership record.

In the space provided below, enter the reason for the error or erasure.

*John Sullivan erred by requesting HCD place  
D-Poll LLC as a legal owner as of 1/14/2019 based on  
UCC filed at CA Secretary of State.*

*There are no liens on this personal property  
2014 manufactured Home owned solely by  
John Sullivan. All liens were satisfied on 7/9/21.  
D-Poll need to be completely removed. D-Poll has been  
been removed on 8/1/21.*

**SECTION III. CERTIFICATION**

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on

*10th of August 2024*

Date

*Riverside, Ca*

City

State

Signature

*John Sullivan*

Address

*16222 Monterey Ln #376 Huntington Beach, Ca*

Address or P.O. Box

*714-321-3449*

City

State

Zip

*92649*



STATE OF CALIFORNIA  
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF CODES AND STANDARDS  
REGISTRATION AND TITLING PROGRAM



LIEN SATISFIED

SECTION I. DESCRIPTION OF UNIT

This unit is a:

☒ Manufactured Home/Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

The Decal (License) No.(s) of the unit is: LBM 1081

The Trade Name of the unit is: Custom Villa

The Serial No.(s) of the unit is: AC 7V710394 GA/GB.

SECTION II. DEBTOR(S) NAME(S)

Name of Debtor(s): JAMES L. GALLIAN; J. SANDYBELL CO. LLC

SECTION III. LIENHOLDER'S CERTIFICATION

This is to certify that our/my lien in the name(s) of the debtor(s) shown above against the described unit has been fully satisfied and has not been assigned to any other party.

I/We certify under penalty of perjury that the foregoing is true and correct.

Print or Type Name of Legal Owner or Jr. Lienholder (Lender):

J-PAD, LLC OR RONALD J. PIERPORT. *Perfected 8-20-2020*

Signature of Legal Owner, Jr. Lienholder (Lender) or their Authorized Agent:

J-PAD, LLC OR RONALD J. PIERPORT. *Released Date 7/9/2021*

8/6/2024  
James Gallian wishes to state  
Supplemental - J-Pad LLC was entered  
in error and not to be  
added as the legal owners of the  
lien satisfied executed by Ronald  
Pierport on 7/9/2021  
James Gallian Ronald Pierport

CA 90503  
State Zip

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY

GAVIN NEWSOM, Governor

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF CODES AND STANDARDS



**Title Search**

Date Printed: Aug 8, 2024

Decal #:	LBM1081	Use Code:	SFD
Manufacturer:	SKYLINE HOMES INC - CLOSED	Original Price Code:	BVH
Tradename:	CUSTOM VILLA	Rating Year:	
Model:		Tax Type:	LPT
Manufactured Date:	05/29/2014	Last ILT Amount:	
Registration Exp:		Date ILT Fees Paid:	
First Sold On:	07/28/2014	ILT Exemption:	NONE

Serial Number	HUD Label / Insignia	Length	Width
AC7V710394GA	PFS1130282	60'	15' 2"
AC7V710394GB	PFS1130281	56'	15' 2"

**Record Conditions:**

- An application for title or registration change is pending with the department. For information regarding this application, please call 1-800-952-8356 and request to speak with a customer representative.

**Registered Owner:**

JAMIE LYNN GALLIAN  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**Last Title Date:** 08/12/2021

**Last Reg Card:** 08/12/2021

**Sale/Transfer Info:** Price \$.00 Transferred on 02/25/2021

**Situs Address:**

16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649  
Situs County: ORANGE

**Title Searches:**

CHRIS HOUSER  
16222 MONTEREY LN OFC  
HUNTINGTON BEACH, CA 92649

**Title File No:** None

\*\*\*END OF TITLE SEARCH\*\*\*



Case 8:21-bk-11710-SC Doc 421 Filed 08/26/24 Entered 08/27/24 10:38:06 Desc  
Main Document Page 43 of 93  
STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
**REGISTRATION CARD**

Manufactured Home

**Decal: LBM1081**

Manufacturer ID/Name	Trade Name	Model	DOM	DFS	RY	Exp. Date
90002 SKYLINE HOMES INC - CLOSED	CUSTOM VILLA		05/29/2014	07/28/2014		
Serial Number	Label/Insignia Number	Weight	Length	Width	Issued	
ACTV710394GB	PFS1130281	22,383	56'	15' 2"	Aug 09, 2024	
ACTV710394GA	PFS1130282	25,068	60'	15' 2"		

**Addressee**

JAMIE LYNN GALLIAN  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649



**Registered Owner(s)**

JAMIE LYNN GALLIAN  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**Situs Address**

16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

\*\*\*\*\*

**ATTENTION OWNER:**

THIS IS THE REGISTRATION CARD FOR THE  
UNIT DESCRIBED ABOVE. PLEASE KEEP THIS  
CARD IN A SAFE PLACE WITHIN THE UNIT.

**INSTRUCTIONS FOR RENEWAL:**

REGISTRATION FOR THIS UNIT EXPIRES ON THE  
DATE INDICATED ABOVE IN THE BOX LABELED  
"Exp. Date". THERE ARE SUBSTANTIAL  
PENALTIES FOR DELINQUENCY. IF YOU DO NOT  
RECEIVE A RENEWAL NOTICE WITHIN 10 DAYS  
PRIOR TO THE EXPIRATION DATE, CONTACT  
H.C.D. FOR RENEWAL INSTRUCTIONS.

\*\*\*\*\*

**IMPORTANT**

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE  
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

DTN: 13413446

08092024 - 1



**CERTIFICATE OF TITLE**

Manufactured Home

**Decal: LBM1081**

<b>Manufacturer ID/Name</b> 90002 SKYLINE HOMES INC - CLOSED	<b>Trade Name</b> CUSTOM VILLA	<b>Model</b>	<b>DOM</b> 05/29/2014	<b>DFS</b> 07/28/2014	<b>RY</b>
<b>Serial Number</b> AC7V710394GB AC7V710394GA	<b>Label/Insignia Number</b> PFS1130281 PFS1130282	<b>Weight</b> 22,383 25,068	<b>Length</b> 56' 60'	<b>Width</b> 15' 2" 15' 2"	<b>Issued</b> Aug 09, 2024

**Addressee**

JAMIE LYNN GALLIAN  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**Registered Owner(s)**

JAMIE LYNN GALLIAN  
16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**Situs Address**

16222 MONTEREY LN SPACE 376  
HUNTINGTON BEACH, CA 92649

**IMPORTANT**

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE  
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.



1 TRUSTEE'S ADVERSARY COMPLAINT  
2 CASE NO. 8:23-AP-01064

3 1. DOC 83 DEFAULT JUDGEMENT AGAINST RONALD PIERPONT

4 2. TABLE OF UCC'S PAGE 41-60

5 APPEAR UCC'S NOT RELEVANT TO `CAUSES AND  
6 ALLEGATIONS AGAINST RONALD PIERPONT. PIERPONT'S  
7 PERFECTED LIEN ON FACE OF CERTIFICATE OF TITLE IS LAWFUL  
8 AND EXECUTION OF LIEN SATISFIED 7/9/2021, TWO YEARS  
9 BEFORE TRUSTEE'S FILED THIS ADVERSARY SEEMS  
10 NONSENSICAL CONSIDERING THE FACTS PRESENTED.

11  
12 3. DOC 98 Order Dismissing Trustee's Alternative  
13 And Remaining Claims Against The Defendants  
14 Without Prejudice. IT IS ORDERED: 1. The Alternative  
15 And Remaining Claims For Relief In The Plaintiff's Complaint Are  
16 DISMISSED Without Prejudice, As Follows:

17 a. The Seventh Claim For Relief Is DISMISSED Against  
18 Defendants Steven D. Gallian, Brian J. Gallian, Justin Barclay, E. J.  
19 Gallian, And Robert J. McLelland, Without Prejudice.

20 **b, The First, Second, Third, Fourth, And Seventh**  
21 **Claims For Relief Are DISMISSED Against Defendant**  
22 **Ronald J. Pierpont, Without Prejudice.**  
23 **SEE U.C.C. TABLE PAGE 48 OF THIS MOTION.**

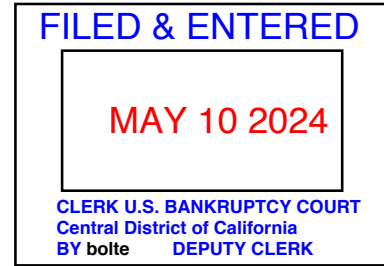
24  
25 c. The Second, Third, Fourth, Sixth, Seventh, Eighth, Ninth, And  
26 Tenth Claims For Relief Are DISMISSED Against Defendant J-Pad  
27 LLC Without Prejudice.

28 d. The Second, Third, Fourth, Fifth, Sixth, And Seventh Claims For  
Relief Are DISMISSED Against Defendant J- Sandcastle Co., LLC,  
Without Prejudice.

(BNC-PDF) Signed on 7/9/2024. (NB8) (Entered: 07/09/2024)

ERIC P. ISRAEL (State Bar No. 132426)  
*eisrael@DanningGill.com*  
AARON E. DE LEEST (State Bar No. 216832)  
*adeleest@DanningGill.com*  
SHANTAL MALMED (State Bar No. 351496)  
*smalmed@DanningGill.com*  
DANNING, GILL, ISRAEL & KRASNOFF, LLP  
1901 Avenue of the Stars, Suite 450  
Los Angeles, California 90067-6006  
Telephone: (310) 277-0077  
Facsimile: (310) 277-5735

Attorneys for Plaintiff Jeffrey I. Golden,  
Chapter 7 Trustee



**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**SANTA ANA DIVISION**

In re  
JAMIE LYNN GALLIAN,  
Debtor.

Case No. 8:21-bk-11710-SC  
Chapter 7

JEFFREY I. GOLDEN, Chapter 7 Trustee,  
Plaintiff,  
vs.  
J-SANDCASTLE CO., LLC; J-PAD LLC;  
STEVEN D. GALLIAN; BRIAN J.  
GALLIAN; JUSTIN BARCLAY; RONALD  
J. PIERPONT; ROBERT J. MCLELLAND;  
AND E.J. GALLIAN,  
Defendants.

Adv. No. 8:23-ap-01064-SC  
**DEFAULT JUDGMENT AGAINST  
RONALD J. PIERPONT**  
Date: May 7, 2024  
Time: 1:30 p.m.  
Place: Courtroom 5C  
411 W. Fourth Street  
Santa Ana, California 92701

On March 27, 2024, Plaintiff Jeffrey I. Golden, as the Chapter 7 Trustee (the “Trustee” or “Plaintiff”) for the bankruptcy estate of Jamie Lynn Gallian (the “Debtor”), filed the Motion for Default Judgment under LBR 7055-1 against Defendant Ronald J. Pierpont (the “Motion”) (*docket no. 58*), which was heard by the Court on May 7, 2024. Default was previously entered against Defendant Ronald J. Pierpont (the “Defendant”) on August 22, 2023.

1 The Court having granted the Motion pursuant to an order entered contemporaneously  
2 herewith, and good cause appearing:

3 IT IS ORDERED, ADJUDGED AND DECREED THAT:

4 1. Default judgment is entered in favor of the Plaintiff and against the Defendant on  
5 the Plaintiff's fifth and sixth claims for relief in the Complaint.

6 2. The Defendant is not a party to any security agreement or agreements that would  
7 grant Defendant a security interest in or lien on the manufactured home located at 16222 Monterey  
8 Lane, Space #376, Huntington Beach, CA 92649, Decal # LBM1081, Serial # AC7V710394GA,  
9 AC7V710394GB (the "Property").

10 3. The Defendant has no interest in the Property.

11 4. The Defendant does not have any valid, perfected, and/or unavoidable liens on the  
12 Property.


13 5. The transfers to the Defendant relating to the Property, including the following  
14 UCC Financing Statement Amendments (UCC-3), and any liens on the Property in favor of the  
15 Defendant are avoided and preserved for the benefit of the Debtor's estate in the name of  
16 Jeffrey I. Golden, Chapter 7 Trustee for the bankruptcy estate of Jamie Lynn Gallian.

UCC Filing Date	UCC Type	Filing No.
12/4/2020	UCC-3 Amendment	U200034803831
9/8/2021	UCC-3 Amendment	U210083394336
9/8/2021	UCC-3 Amendment	U210083400018
9/12/2021	UCC-3 Amendment	U210084251426
9/12/2021	UCC-3 Amendment	U210084255728
9/12/2021	UCC-3 Amendment	U210084256326
9/24/2021	UCC-3 Amendment	U210088103629

1           6.       Pursuant of Rule 54 of the Federal Rules of Civil Procedure there is no just reason  
2 for delay in entry of this judgment against the Defendant.

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24       Date: May 10, 2024

  
Scott C. Clarkson  
United States Bankruptcy Judge

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UCC Filing Date	UCC Type	Filing No.
1/14/2019	UCC-1 Financing Statement	197691916827
1/14/2019	UCC-1 Financing Statement	197691915674
1/14/2019	UCC-1 Financing Statement	197691905279
12/4/2020	UCC-3 Amendment	U200034803831
9/8/2021	UCC-3 Amendment	U210083394336
9/8/2021	UCC-3 Amendment	U210083400018
9/12/2021	UCC-3 Amendment	U210084251426
9/12/2021	UCC-3 Amendment	U210084255728
9/12/2021	UCC-3 Amendment	U210084256326
9/24/2021	UCC-3 Amendment	U210088103629

1770829.1 27064

2

## UCC FINANCING STATEMENT

### FOLLOW INSTRUCTIONS

<b>A. NAME &amp; PHONE OF CONTACT AT FILER (optional)</b> Jamie Gallian 714-321-3449
<b>B. E-MAIL CONTACT AT FILER (optional)</b>
<b>C. SEND ACKNOWLEDGMENT TO: (Name and Address)</b> Jamie Lynn Gallian 16222 Monterey Ln #376 Huntington Beach, CA 92649 USA

DOCUMENT NUMBER: 76027940003  
FILING NUMBER: 19-7691916827  
FILING DATE: 01/14/2019 09:10

IMAGE GENERATED ELECTRONICALLY FOR WEB FILING  
THE ABOVE SPACE IS FOR CA FILING OFFICE USE ONLY

1. DEBTOR'S NAME: Provide only one Debtor name (1a or 1b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); If any part of the Individual Debtor's name will not fit in line 1b, leave all of item 1 blank, check here ☒ and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

OR	1a. ORGANIZATION'S NAME J-SANDCASTLE CO LLC	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX	
	1b. INDIVIDUAL'S SURNAME				
1c. MAILING ADDRESS 16222 MONTEREY LN #376		CITY HUNTINGTON BEACH	STATE CA	POSTAL CODE 92649	COUNTRY USA

2. DEBTOR'S NAME: Provide only one Debtor name (2a or 2b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); If any part of the Individual Debtor's name will not fit in line 2b, leave all of item 2 blank, check here ☒ and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

OR	2a. ORGANIZATION'S NAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX	
	2b. INDIVIDUAL'S SURNAME				
2c. MAILING ADDRESS		CITY	STATE	POSTAL CODE	COUNTRY

3. SECURED PARTY'S NAME (or NAME of ASSIGNEE of ASSIGNOR SECURED PARTY): Provide only one Secured Party name (3a or 3b)

OR	3a. ORGANIZATION'S NAME J-Pad, LLC - CA SOS Entity No. 201804010750	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX	
	3b. INDIVIDUAL'S SURNAME				
3c. MAILING ADDRESS 2702 N GAFF ST		CITY ORANGE	STATE CA	POSTAL CODE 92865	COUNTRY USA

4. COLLATERAL: This financing statement covers the following collateral:  
LOCATED ON PROPERTY RECORDED IN ORANGE COUNTY CLERK RECORDERS OFFICE IN CALIFORNIA PARCEL MAP  
RECORDED IN BOOK 108, PG(S) 47-48.

ASSESSORS PARCEL NUMBER 891-569-62  
SERIAL NUMBERS AC7V710394GB, AC7V710394GA; DECAL NUMBER LBM1081

5. Check only if applicable and check only one box: Collateral is ☒ held in a Trust (see UCC1Ad, item 17 and instructions) ☐ being administered by a Decedent's Personal Representative

6a. Check only if applicable and check only one box:

☒ Public Finance Transaction ☒ Manufactured Home Transaction ☐ A Debtor is a Transmitting Utility

6b. Check only if applicable and check only one box:

☐ Agricultural Lien ☐ Non-UCC Filing

7. ALTERNATIVE DESIGNATION (if applicable): ☐ Lessee/Lessor ☐ Consignee/Consignor ☐ Seller/Buyer ☐ Bailee/Bailor ☐ Licensee/Licensor

8. OPTIONAL FILER REFERENCE DATA:

FILING OFFICE COPY



Page 2

## UCC FINANCING STATEMENT ADDENDUM

### FOLLOW INSTRUCTIONS

9. NAME OF FIRST DEBTOR: Same as line 1a or 1b on Financing Statement; if line 1b was left blank because individual Debtor name did not fit, check here <input type="checkbox"/>					
OR	9a. ORGANIZATION'S NAME J-SANDCASTLE CO LLC				
	9b. INDIVIDUAL'S SURNAME				
	FIRST PERSONAL NAME				
	ADDITIONAL NAME(S)/INITIAL(S)			SUFFIX	
DOCUMENT NUMBER: 76027940003 IMAGE GENERATED ELECTRONICALLY FOR WEB FILING THE ABOVE SPACE IS FOR CA FILING OFFICE USE ONLY					
10. DEBTOR'S NAME: Provide (10a or 10b) only <u>one</u> additional Debtor name or Debtor name that did not fit in line 1b or 2b of the Financing Statement (Form UCC1) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name) and enter the mailing address in line 10c					
OR	10a. ORGANIZATION'S NAME				
	10b. INDIVIDUAL'S SURNAME				
	INDIVIDUAL'S FIRST PERSONAL NAME				
	INDIVIDUAL'S ADDITIONAL NAME(S)/INITIAL(S)			SUFFIX	
10c. MAILING ADDRESS		CITY	STATE	POSTAL CODE	COUNTRY
11. <input type="checkbox"/> ADDITIONAL SECURED PARTY'S NAME or <input checked="" type="checkbox"/> ASSIGNOR SECURED PARTY'S NAME: Provide only <u>one</u> name (11a or 11b)					
OR	11a. ORGANIZATION'S NAME				
	11b. INDIVIDUAL'S SURNAME GAILLIAN		FIRST PERSONAL NAME JAMIE	ADDITIONAL NAME(S)/INITIAL(S) LYNN	SUFFIX
	11c. MAILING ADDRESS 16222 MONTEREY LANE #376		CITY HUNTINGTON BEACH	STATE CA	POSTAL CODE 92649
12. ADDITIONAL SPACE FOR ITEM 4 (collateral):					
13. <input type="checkbox"/> This FINANCING STATEMENT is to be filed (for record) (or recorded) in the REAL ESTATE RECORDS (if applicable)			14. This FINANCING STATEMENT: <input type="checkbox"/> covers timber to be cut <input type="checkbox"/> covers as-extracted collateral <input type="checkbox"/> is filed as a fixture filing.		
15. Name and address of RECORD OWNER of real estate described in item 16 (if Debtor does not have a record interest):			16. Description of real estate:		
17. MISCELLANEOUS:					

FILING OFFICE COPY

## UCC FINANCING STATEMENT

### FOLLOW INSTRUCTIONS

A. NAME & PHONE OF CONTACT AT FILER (optional) Jamie Gallian 714-321-3449
B. E-MAIL CONTACT AT FILER (optional)
C. SEND ACKNOWLEDGMENT TO: (Name and Address) Jamie Lynn Gallian 16222 Monterey Ln #376 Huntington Beach, CA 92649 USA

DOCUMENT NUMBER: 76027940002  
FILING NUMBER: 19-7691915674  
FILING DATE: 01/14/2019 08:55

IMAGE GENERATED ELECTRONICALLY FOR WEB FILING  
THE ABOVE SPACE IS FOR CA FILING OFFICE USE ONLY

1. DEBTOR'S NAME: Provide only one Debtor name (1a or 1b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 1b, leave all of item 1 blank, check here ☐ and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

OR	1a. ORGANIZATION'S NAME J-SANDCASTLE CO LLC				
	1b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX	
1c. MAILING ADDRESS 16222 MONTEREY LN #376		CITY HUNTINGTON BEACH	STATE CA	POSTAL CODE 92649	COUNTRY USA

2. DEBTOR'S NAME: Provide only one Debtor name (2a or 2b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 2b, leave all of item 2 blank, check here ☐ and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

OR	2a. ORGANIZATION'S NAME				
	2b. INDIVIDUAL'S SURNAME GALLIAN	FIRST PERSONAL NAME JAMIE	ADDITIONAL NAME(S)/INITIAL(S) LYNN	SUFFIX	
2c. MAILING ADDRESS 16222 MONTEREY LANE #376		CITY HUNTINGTON BEACH	STATE CA	POSTAL CODE 92649	COUNTRY USA

3. SECURED PARTY'S NAME (or NAME of ASSIGNEE of ASSIGNOR SECURED PARTY): Provide only one Secured Party name (3a or 3b)

OR	3a. ORGANIZATION'S NAME J-Pad, LLC - CA SOS Entity No. 201804010750				
	3b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX	
3c. MAILING ADDRESS 2702 N GAFF STREET		CITY ORANGE	STATE CA	POSTAL CODE 92865	COUNTRY USA

4. COLLATERAL: This financing statement covers the following collateral:  
LOCATED ON CLERK RECORDER OFFICE OF ORANGE COUNTY CALIFORNIA FILED DECEMBER 20, 1977, PARCEL MAP  
BOOK NO. 108 PG(S) 47, 48, T.P.M.  
77-7, R.S.T.8531

SERIAL NUMBER AC7V710394GB, AC7V710394GA; DECAL NUMBER LBM1081  
ASSESSORS PARCEL NUMBER 891-569-62

5. Check only if applicable and check only one box: Collateral is ☐ held in a trust (see UCC1Ad, item 17 and instructions) ☐ being administered by a Decedent's Personal Representative

6a. Check only if applicable and check only one box:

☐ Public-Finance Transaction ☐ Manufactured-Home Transaction ☐ A Debtor is a Transmitting Utility

6b. Check only if applicable and check only one box:

☐ Agricultural Lien ☐ Non-UCC Filing

7. ALTERNATIVE DESIGNATION (if applicable): ☐ Lessee/Lessor ☐ Consignee/Consignor ☐ Seller/Buyer ☐ Bailor/Balior ☐ Licensee/Licenser

8. OPTIONAL FILER REFERENCE DATA:

FILING OFFICE COPY



## UCC FINANCING STATEMENT

### FOLLOW INSTRUCTIONS

A. NAME & PHONE OF CONTACT AT FILER (optional) Jamie Gallian 714-321-449
B. E-MAIL CONTACT AT FILER (optional)
C. SEND ACKNOWLEDGMENT TO: (Name and Address) J-Pad, LLC 5782 Pinon Drive Huntington Beach, CA 92649 USA

DOCUMENT NUMBER: 76027030002  
FILING NUMBER: 19-7691905279  
FILING DATE: 01/14/2019 08:16

IMAGE GENERATED ELECTRONICALLY FOR WEB FILING  
THE ABOVE SPACE IS FOR CA FILING OFFICE USE ONLY

1. DEBTOR'S NAME: Provide only one Debtor name (1a or 1b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); If any part of the Individual Debtor's name will not fit in line 1b, leave all of item 1 blank, check here ☐ and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

OR	1a. ORGANIZATION'S NAME J-Sandcastle Co LLC				
	1b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX	
1c. MAILING ADDRESS 16222 Monterey Lane #376		CITY Huntington Beach	STATE CA	POSTAL CODE 92649	COUNTRY USA

2. DEBTOR'S NAME: Provide only one Debtor name (2a or 2b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); If any part of the Individual Debtor's name will not fit in line 2b, leave all of item 2 blank, check here ☐ and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

OR	2a. ORGANIZATION'S NAME				
	2b. INDIVIDUAL'S SURNAME Gallian	FIRST PERSONAL NAME Jamie	ADDITIONAL NAME(S)/INITIAL(S) Lynn	SUFFIX	
2c. MAILING ADDRESS 16222 Monterey Ln #376		CITY Huntington Beach	STATE CA	POSTAL CODE 92649	COUNTRY USA

3. SECURED PARTY'S NAME (or NAME of ASSIGNEE of ASSIGNOR SECURED PARTY): Provide only one Secured Party name (3a or 3b)

OR	3a. ORGANIZATION'S NAME J-Pad, LLC - CA SOS Entity No. 201804010750				
	3b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX	
3c. MAILING ADDRESS 2702 N GAFF STREET		CITY ORANGE	STATE CA	POSTAL CODE 92865	COUNTRY USA

4. COLLATERAL: This financing statement covers the following collateral:  
ORANGE COUNTY CALIFORNIA ASSESSOR'S PARCEL NUMBER 891-569-62  
SERIAL NUMBERS AC7V710394GB, AC7V710394GA  
DECAL NUMBER LBM1081

5. Check only if applicable and check only one box: Collateral is ☐ held in a Trust (see UCC1Ad, item 17 and instructions) ☐ being administered by a Decedent's Personal Representative

6a. Check only if applicable and check only one box:

☐ Public-Finance Transaction ☒ Manufactured-Home Transaction ☐ A Debtor is a Transmitting Utility

6b. Check only if applicable and check only one box:

☐ Agricultural Lien ☐ Non-UCC Filing

7. ALTERNATIVE DESIGNATION (if applicable): ☐ Lessor/Lessor ☐ Consignee/Consignor ☐ Seller/Buyer ☐ Bailee/Bailor ☐ Licensee/Licensor

8. OPTIONAL FILER REFERENCE DATA:

FILING OFFICE COPY



U200034803831



**STATE OF CALIFORNIA**  
*Office of the Secretary of State, Alex Padilla*  
**UCC FINANCING STATEMENT AMENDMENT (UCC  
3)**  
California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File #: U200034803831

Date Filed: 12/4/2020

B0349-4529 12/04/2020 2:14 PM Received by California Secretary of State

Submitter Information:

Contact Name

Organization Name

Phone Number

Email Address

Address

None

Amendment Action Information:

Initial Financing Statement File Number

197691905279

Date Filed

01/14/2019

Amendment Action

Secured Party Amendment

Secured Party Action

Add Secured Party

Add Secured Party:

Secured Party Name	Mailing Address
Steven D Gallian	16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649
Brian J Gallian	16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649

Name of Secured Party of Record Authorizing This Amendment:

☐ If this Amendment is authorized by a Debtor, check this box and select the name of the Authorizing Debtor below.

Authorizing Secured Party Name

J-PAD, LLC - CA SOS ENTITY NO. 201804010750

Optional Filer Reference Information:

Miscellaneous Information:



U210083394336



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT AMENDMENT (UCC  
3)**

California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File #: U210083394336

Date Filed: 9/8/2021

B0428-3050 09/08/2021 3:22 PM Received by California Secretary of State

Submitter Information:

Contact Name

Organization Name

Phone Number

Email Address

Address

None

Amendment Action Information:

Initial Financing Statement File Number

197691905279

Date Filed

01/14/2019

Amendment Action

Secured Party Amendment

Secured Party Action

Add Secured Party

Add Secured Party:

Secured Party Name	Mailing Address
RONALD J. PIERPONT	4519 PONDEROSA WAY YORBA LINDA, CA 92886 HUTINGTON BEACH, CA 92649
ROBERT MCLELLAND	21742 ANZA AVENUE TORRANCE, CA 90503
JUSTIN D. BARCLAY	16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649
E. J. GALLIAN	16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649

Name of Secured Party of Record Authorizing This Amendment:

☐ If this Amendment is authorized by a Debtor, check this box and select the name of the Authorizing Debtor below.

Authorizing Secured Party Name

J-PAD, LLC - CA SOS ENTITY NO. 201804010750

Optional Filer Reference Information:

Miscellaneous Information:





U210083400018



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT AMENDMENT (UCC  
3)**

California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File #: U210083400018

Date Filed: 9/8/2021

B0428-3116 09/08/2021 3:41 PM Received by California Secretary of State

Submitter Information:

Contact Name

Organization Name

Phone Number

Email Address

Address

None

Amendment Action Information:

Initial Financing Statement File Number

197691905279

Date Filed

01/14/2019

Amendment Action

Secured Party Amendment

Secured Party Action

Edit Secured Party

Edit Secured Party:

Secured Party Name	Mailing Address
<i>Changed From:</i> JUSTIN D. BARCLAY <i>Changed To:</i> JUSTIN D. BARCLAY	<i>Changed From:</i> 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649 <i>Changed To:</i> 3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
<i>Changed From:</i> BRIAN J GALLIAN <i>Changed To:</i> BRIAN J GALLIAN	<i>Changed From:</i> 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649 <i>Changed To:</i> 3334 E. COAST HWY. #126 HUNTINGTON BEACH, CA 92649
<i>Changed From:</i> E. J. GALLIAN <i>Changed To:</i> E. J. GALLIAN	<i>Changed From:</i> 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649 <i>Changed To:</i> 3334 E. COAST HWY. #126 HUNTINGTON BEACH, CA 92649
<i>Changed From:</i> STEVEN D GALLIAN <i>Changed To:</i> STEVEN D GALLIAN	<i>Changed From:</i> 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649 <i>Changed To:</i> 3334 E. COAST HWY #126 CORONA DEL MAR, CA 92625
<i>Changed From:</i> J-PAD, LLC - CA SOS ENTITY NO. 201804010750 <i>Changed To:</i> J-PAD, LLC - CA SOS ENTITY NO. 201804010750	<i>Changed From:</i> 2702 N GAFF STREET ORANGE, CA 92865 <i>Changed To:</i> 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649

Name of Secured Party of Record Authorizing This Amendment:



☐ If this Amendment is authorized by a Debtor, check this box and select the name of the Authorizing Debtor below.

Authorizing Secured Party Name

J-PAD, LLC - CA SOS ENTITY NO. 201804010750

Optional Filer Reference Information:

Miscellaneous Information:

B0428-3117 09/08/2021 3:41 PM Received by California Secretary of State



U210084251426



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT AMENDMENT (UCC  
3)**

California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File #: U210084251426

Date Filed: 9/12/2021

B0428-8874 09/12/2021 10:11 AM Received by California Secretary of State

**Submitter Information:**

Contact Name	Ron Pierpont; Bob McLelland, its Managers
Organization Name	J-Pad, LLC
Phone Number	(909) 202-3145
Email Address	ronpierpont@gmail.com
Address	4519 Ponderosa Way Yorba Linda, CA 92886

**Amendment Action Information:**

Initial Financing Statement File Number	197691916827
Date Filed	01/14/2019
Amendment Action	Secured Party Amendment
Secured Party Action	Add Secured Party

**Add Secured Party:**

Secured Party Name	Mailing Address
Steven D. Gallian	3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
Brian J. Gallian	3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
Justin D. Barclay	3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
Ronald J. Pierpont	4519 PONDEROSA WAY YORBA LINDA, CA 92886
Robert J. McLelland	21742 ANZA AVENUE TORRANCE, CA 90503
Jamie L. Gallian	16222 MONTEREY LN. #376 HUNTINGTON BEACH, CA 92649
EJ Gallian	BRIAN J. GALLIAN 3334 E. COAST HWY #126 CORONA DEL MAR, CA 92625

**Name of Secured Party of Record Authorizing This Amendment:**

☐ If this Amendment is authorized by a Debtor, check this box and select the name of the Authorizing Debtor below.

Authorizing Secured Party Name J-PAD, LLC - CA SOS ENTITY NO. 201804010750

**Optional Filer Reference Information:**

J-Pad, LLC Ronald J. Pierpont and Robert J. McLelland, It's Managers

**Miscellaneous Information:**

B0428-8875 09/12/2021 10:11 AM Received by California Secretary of State

This is a Secured Party Amendment to U197691916827 filed 1/14/2019, adding all Secured Parties, as individuals who have a defined percentage interest in the collateral known as LBM1081, A.P.N. 891-569-62, 2014 Skyline Custom Villa, Serial No. 7V710394GB/GA, located on APN 178-011-16, Lot 376, 16222 Monterey Lane Huntington Beach, CA 92649, to mirror the Secured Parties listed in U197691905279, filed 1/14/2019 and its Amendments therein. J-Pad, LLC will continue to be the Legal Owner listed on the COT and Note and entity who Manages the collateral for all Secured Parties.



U210084255728



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT AMENDMENT (UCC  
3)**

California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File #: U210084255728

Date Filed: 9/12/2021

B0428-8950 09/12/2021 9:27 PM Received by California Secretary of State

**Submitter Information:**

Contact Name	Ronald Pierpont or Robert Mclelland, its Managers
Organization Name	J--Pad, LLC
Phone Number	(714) 742-5999
Email Address	bobwentflying@yahoo.com
Address	4519 Ponderosa Way Yorba Linda, CA 92886

**Amendment Action Information:**

Initial Financing Statement File Number	197691905279
Date Filed	01/14/2019
Amendment Action	Secured Party Amendment
Secured Party Action	Edit Secured Party

**Edit Secured Party:**

Secured Party Name	Mailing Address
<i>Changed From:</i> JUSTIN D. BARCLAY <i>Changed To:</i> JUSTIN D. BARCLAY	<i>Changed From:</i> 3334 E. COAST HWY, #126 CORONA DEL MAR, CA 92625 <i>Changed To:</i> 3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
<i>Changed From:</i> BRIAN J GALLIAN <i>Changed To:</i> BRIAN J. GALLIAN	<i>Changed From:</i> 3334 E. COAST HWY. #126 HUNTINGTON BEACH, CA 92649 <i>Changed To:</i> 3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
<i>Changed From:</i> E. J. GALLIAN <i>Changed To:</i> E. J. GALLIAN	<i>Changed From:</i> 3334 E. COAST HWY. #126 HUNTINGTON BEACH, CA 92649 <i>Changed To:</i> BRIAN J. GALLIAN 3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
<i>Changed From:</i> STEVEN D GALLIAN <i>Changed To:</i> STEVEN D. GALLIAN	<i>Changed From:</i> 3334 E. COAST HWY #126 CORONA DEL MAR, CA 92625 <i>Changed To:</i> 3334 E. COAST HWY #126 CORONA DEL MAR, CA 92625
<i>Changed From:</i> J-PAD, LLC - CA SOS ENTITY NO. 201804010750 <i>Changed To:</i> J-PAD, LLC - CA SOS ENTITY NO. 201804010750	<i>Changed From:</i> 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649 <i>Changed To:</i> 21742 ANZA AVENUE TORRANCE, CA 92503



B0428-8951 09/12/2021 9:27 PM Received by California Secretary of State

<p><i>Changed From:</i> ROBERT MCLELLAND</p> <p><i>Changed To:</i> ROBERT MCLELLAND</p>	<p><i>Changed From:</i> 21742 ANZA AVENUE TORRANCE, CA 90503</p> <p><i>Changed To:</i> 21742 ANZA AVENUE TORRANCE, CA 90503</p>
<p><i>Changed From:</i> RONALD J. PIERPONT</p> <p><i>Changed To:</i> RONALD J. PIERPONT</p>	<p><i>Changed From:</i> 4519 PONDEROSA WAY YORBA LINDA, CA 92886 HUTINGTON BEACH, CA 92649</p> <p><i>Changed To:</i> 4519 PONDEROSA WAY YORBA LINDA, CA 92886</p>

Name of Secured Party of Record Authorizing This Amendment:

☐ If this Amendment is authorized by a Debtor, check this box and select the name of the Authorizing Debtor below.

Authorizing Secured Party Name J-PAD, LLC - CA SOS ENTITY NO. 201804010750

Optional Filer Reference Information:

Miscellaneous Information:

This is a Secured Party Amendment to U197691916827 and U197691905279, Filed on 1/14/2019. and Amendment filed 12/4/2020 U200034803831. This filing secures the personal property collateral to the Secured Parties herein, known as LBM1081, LPT APN 891-569-62, 2014 Skyline Custom Villa the primary residence of Jamie Lynn Gallian. Homestead Declaration filed 7/9/2021 @ 12:48 p.m. Clerk Recorder County of Orange. HCD Registration transferred from J-Sandcastle Co LLC perfected on 2/25/2021. J-Pad, LLC holder of Certificate of Title perfected with HCD 1/14/2019, a manager-managed LLC. entity no. 201804010750.



U210084256326



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT AMENDMENT (UCC  
3)**  
California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only

**-FILED-**

File #: U210084256326

Date Filed: 9/12/2021

B0428-8959 09/13/2021 12:00 AM Received by California Secretary of State

Submitter Information:

Contact Name Ronald J. Pierpont; Robert McLelland, its Managers  
Organization Name J-Pad, LLC - CA SOS Entity No. 201804010750  
Phone Number (714) 742-5999  
Email Address ronpierpont@gmail.com  
Address 21742 Anza Avenue  
Torrance, CA 90503

Amendment Action Information:

Initial Financing Statement File Number 197691905279  
Date Filed 01/14/2019  
Amendment Action Secured Party Amendment  
Secured Party Action Edit Secured Party

Edit Secured Party:

Secured Party Name	Mailing Address
<i>Changed From:</i> JUSTIN D. BARCLAY <i>Changed To:</i> JUSTIN D. BARCLAY	<i>Changed From:</i> 3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625 <i>Changed To:</i> 3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
<i>Changed From:</i> BRIAN J GALLIAN <i>Changed To:</i> BRIAN J GALLIAN	<i>Changed From:</i> 3334 E. COAST HWY. #126 HUNTINGTON BEACH, CA 92649 <i>Changed To:</i> 3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
<i>Changed From:</i> E. J. GALLIAN <i>Changed To:</i> E. J. GALLIAN	<i>Changed From:</i> 3334 E. COAST HWY. #126 HUNTINGTON BEACH, CA 92649 <i>Changed To:</i> 3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
<i>Changed From:</i> STEVEN D GALLIAN <i>Changed To:</i> STEVEN D GALLIAN	<i>Changed From:</i> 3334 E. COAST HWY #126 CORONA DEL MAR, CA 92625 <i>Changed To:</i> 3334 E. COAST HWY #126 CORONA DEL MAR, CA 92625
<i>Changed From:</i> J-PAD, LLC - CA SOS ENTITY NO. 201804010750 <i>Changed To:</i> J-PAD, LLC - CA SOS ENTITY NO. 201804010750	<i>Changed From:</i> 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649 <i>Changed To:</i> 21742 ANZA AVENUE TORRANCE, CA 90503

<i>Changed From:</i> ROBERT MCLELLAND <i>Changed To:</i> ROBERT MCLELLAND	<i>Changed From:</i> 21742 ANZA AVENUE TORRANCE, CA 90503 <i>Changed To:</i> 21742 ANZA AVENUE TORRANCE, CA 90503
<i>Changed From:</i> RONALD J. PIERPONT <i>Changed To:</i> RONALD J. PIERPONT	<i>Changed From:</i> 4519 PONDEROSA WAY YORBA LINDA, CA 92886 HUTINGTON BEACH, CA 92649 <i>Changed To:</i> 4519 PONDEROSA WAY YORBA LINDA, CA 92886

Name of Secured Party of Record Authorizing This Amendment:

☐ If this Amendment is authorized by a Debtor, check this box and select the name of the Authorizing Debtor below.

Authorizing Secured Party Name J-PAD, LLC - CA SOS ENTITY NO. 201804010750

Optional Filer Reference Information:

Miscellaneous Information:  
PERSONAL PROPERTY LBM 1081, APN 891-569-62, SERIAL NUMBER 7V710394GB/GA LOCATED ON APN 178-011-16  
16222 MONTEREY LN SPC 376 HUNTINGTON BEACH, CA 92649





U210088103629



**STATE OF CALIFORNIA**  
*Office of the Secretary of State*  
**UCC FINANCING STATEMENT AMENDMENT (UCC  
3)**

California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

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**-FILED-**

File #: U210088103629

Date Filed: 9/24/2021

B0432-8877 09/24/2021 9:04 PM Received by California Secretary of State

**Submitter Information:**

Contact Name Jamie Gallian  
Organization Name  
Phone Number (714) 321-3449  
Email Address JAMIEGALLIAN@GMAIL.COM  
Address 16222 Monterey Ln. #376  
Huntington Beach, CA 92649

**Amendment Action Information:**

Initial Financing Statement File Number 197691905279  
Date Filed 01/14/2019  
Amendment Action Secured Party Amendment  
Secured Party Action Add Secured Party

**Add Secured Party:**

Secured Party Name	Mailing Address
J-PAD, LLC	21742 ANZA AVENUE TORRANCE, CA 90503
STEVEN D. GALLIAN	3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
BRIAN J. GALLIAN	3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
JUSTIN D. BARCLAY	3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625
RONALD J. PIERPONT	4519 PONDEROSA WAY YORBA LINDA, CA 92886
ROBERT J. MCLELLAND	21742 ANZA AVENUE TORRANCE, CA 90503
EJ GALLIAN	3334 E. COAST HWY. #126 CORONA DEL MAR, CA 92625

**Name of Secured Party of Record Authorizing This Amendment:**

☒ If this Amendment is authorized by a Debtor, check this box and select the name of the Authorizing Debtor below.

Authorizing Debtor Name JAMIE LYNN GALLIAN

**Optional Filer Reference Information:**

**Miscellaneous Information:**

This is a Debtor Amendment acknowledging reaffirming the Initial UCC Financing Statement 19-7691905279 filed 1/14/2019, and Amendment filed U20003480383 filed 12/4/2020. The individual secured parties listed have a defined percentage interest in the collateral known as LBM1081, APN 891-569-62, located on APN 178-011-01, Tract 10542 Unit 4, Lot 376. J-Pad, LLC a manager managed LLC will continue to be the Legal Owner listed on the COT and Holder. J-Pad, LLC will continue to manage the collateral for all Secured Parties.



Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address  Aaron E. DE Leest Danning, Gill, Israel & Krasnoff, LLP 1901 Avenue of the Stars Ste 450 Los Angeles, CA 90067-6006  (310) 277-0077  <i>Plaintiff or Attorney for Plaintiff</i>	FOR COURT USE ONLY
<p align="center"><b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA</b></p>	
In re:  Jamie Lynn Gallian  <div align="right">Debtor(s).</div>	CASE NO.: 8:21-bk-11710-SC  CHAPTER: 7  ADVERSARY NUMBER: 8:23-ap-01064-SC
Jeffrey I. Golden  <div align="right">Plaintiff(s)</div> <div align="center">Versus</div> J-Sandcastle Co LLC  (See Attachment A for names of additional defendants)  <div align="right">Defendant(s)</div>	<p align="center"><b>SUMMONS AND NOTICE OF STATUS CONFERENCE IN ADVERSARY PROCEEDING [LBR 7004-1]</b></p>

TO THE DEFENDANT(S): A Complaint has been filed by the Plaintiff against you. If you wish to defend against the Complaint, you must file with the court a written pleading in response to the Complaint. You must also serve a copy of your written response on the party shown in the upper left-hand corner of this page. The deadline to file and serve a written response is **08/02/2023**. If you do not timely file and serve the response, the court may enter a judgment by default against you for the relief demanded in the Complaint.

A status conference in the adversary proceeding commenced by the Complaint has been set for:

**Date:** September 26, 2023  
**Time:** 01:30 PM  
**Hearing Judge:** Scott C Clarkson  
**Location:** 411 W Fourth St., Crtrm 5C, Santa Ana, CA 92701

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This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

**You must comply with LBR 7016–1, which requires you to file a joint status report and to appear at a status conference.** All parties must read and comply with the rule, even if you are representing yourself. You must cooperate with the other parties in the case and file a joint status report with the court and serve it on the appropriate parties at least 14 days before a status conference. A court–approved joint status report form is available on the court's website (LBR form F 7016–1.STATUS.REPORT) with an attachment for additional parties if necessary (LBR form F 7016–1.STATUS.REPORT.ATTACH). If the other parties do not cooperate in filing a joint status report, you still must file with the court a unilateral status report and the accompanying required declaration instead of a joint status report 7 days before the status conference. **The court may fine you or impose other sanctions if you do not file a status report. The court may also fine you or impose other sanctions if you fail to appear at a status conference.**

**KATHLEEN J. CAMPBELL**  
**CLERK OF COURT**

Date of Issuance of Summons and Notice of Status Conference in Adversary Proceeding: July 3, 2023

By: "s/" Nickie Bolte  
Deputy Clerk



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This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

**ATTACHMENT A**  
Names of plaintiffs and defendants

Plaintiff(s):	Defendant(s):
Jeffrey I. Golden	J-Sandcastle Co LLC J-Pad LLC Justin Barclay Steven D Gallian Ronald J. Pierpont Ronald J. McClelland E. J. Gallian Brian J. Gallian



## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
1901 Avenue of the Stars, Suite 450, Los Angeles, California 90067.

A true and correct copy of the foregoing document entitled: **SUMMONS AND NOTICE OF STATUS CONFERENCE IN ADVERSARY PROCEEDING [LBR 7004-1]** and (2) the accompanying pleading(s) entitled: **ORDER RE: RULE 26(f) MEETING, INITIAL DISCLOSURES, AND SCHEDULING CONFERENCE; and CHAPTER 7 TRUSTEE'S COMPLAINT: (1) TO AVOID AND RECOVER FRAUDULENT TRANSFERS; (2) TO AVOID AND RECOVER POSTPETITION TRANSFERS; (3) FOR DECLARATORY RELIEF; (4) FOR BREACH OF CONTRACT; (5) FOR MONEY HAD AND RECEIVED; \*\*** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) July 6, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On (date) July 6, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**\*\*AND (6) UNJUST ENRICHMENT**

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 6, 2023  
Date

Beverly Lew  
Printed Name

/s/ Beverly Lew  
Signature

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

**ADDITIONAL SERVICE INFORMATION (if needed):**

**1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")**

Aaron E. DE Leest on behalf of Plaintiff Jeffrey I. Golden  
adeleest@DanningGill.com, danninggill@gmail.com;adeleest@ecf.inforuptcy.com

Robert P Goe on behalf of Interested Party The Huntington Beach Gables Homeowners  
Association  
kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com

Jeffrey I Golden (TR)  
lwermer@go2.law, jig@trustesolutions.net;kadele@go2.law;C205@ecfcbis.com

United States Trustee (SA)  
ustpreion16.sa.ecf@usdoj.gov

**2. SERVED BY U.S. MAIL**

J-Sandcastle Co., LLC  
Jamie Lynn Gallian, Managing Member  
16222 Monterey Ln Unit 376  
Huntington Beach, CA 92649

J-Pad LLC  
Jamie Lynn Gallian, Managing Member  
16222 Monterey Ln Unit 376  
Huntington Beach, CA 92649

Steven Gallian  
2633 Luminous Lane  
Costa Mesa, CA 92626

Brian Gallian  
924 Junipero Drive  
Costa Mesa, CA 92626

Justin Barclay  
2407 N Driftwood Avenue  
Rialto, CA 92377

Ronald J. Pierpont  
4519 Ponderosa Way  
Yorba Linda, CA 92886

Robert J. McLelland  
16222 Monterey Ln Unit 376  
Huntington Beach, CA 92649

E. J. Gallian and Brian Gallian  
924 Junipero Drive  
Costa Mesa, CA 92626

The Honorable Scott C. Clarkson  
U.S. Bankruptcy Court  
411 W. Fourth Street, Suite 5130  
Santa Ana, CA 92701

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address  Aaron E. DE Leest Danning, Gill, Israel & Krasnoff, LLP 1901 Avenue of the Stars Ste 450 Los Angeles, CA 90067-6006  (310) 277-0077   <i>Plaintiff or Attorney for Plaintiff</i>	FOR COURT USE ONLY
<p style="text-align: center;"><b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA</b></p>	
In re:   Jamie Lynn Gallian   <div style="text-align: right;">Debtor(s).</div>	CASE NO.: 8:21-bk-11710-SC  CHAPTER: 7  ADVERSARY NUMBER: 8:23-ap-01064-SC
Jeffrey I. Golden   <div style="text-align: right;">Plaintiff(s)</div> Versus  J-Sandcastle Co LLC  (See Attachment A for names of additional defendants) <div style="text-align: right;">Defendant(s)</div>	<p style="text-align: center;"><b>SUMMONS AND NOTICE OF STATUS CONFERENCE IN ADVERSARY PROCEEDING [LBR 7004-1]</b></p>

TO THE DEFENDANT(S): A Complaint has been filed by the Plaintiff against you. If you wish to defend against the Complaint, you must file with the court a written pleading in response to the Complaint. You must also serve a copy of your written response on the party shown in the upper left-hand corner of this page. The deadline to file and serve a written response is **08/02/2023**. If you do not timely file and serve the response, the court may enter a judgment by default against you for the relief demanded in the Complaint.

A status conference in the adversary proceeding commenced by the Complaint has been set for:

**Date:** September 26, 2023  
**Time:** 01:30 PM  
**Hearing Judge:** Scott C Clarkson  
**Location:** 411 W Fourth St., Crtrm 5C, Santa Ana, CA 92701

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This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.



Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address AARON E. DE LEEST (State Bar No. 132426) adeleest@DanningGill.com DANNING, GILL, ISRAEL & KRASNOFF, LLP 1901 Avenue of the Stars, Suite 450 Los Angeles, California 90067-6006 Telephone (310) 277-0077 Facsimile (310) 277-5735	FOR COURT USE ONLY
<input type="checkbox"/> Plaintiff(s) appearing without attorney <input checked="" type="checkbox"/> Attorney for Plaintiff(s)	
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION</b>	
In re: JAMIE LYNN GALLIAN,  Debtor(s).  JEFFREY I. GOLDEN, Chapter 7 Trustee,  Plaintiff(s),  vs. J-SANDCASTLE CO., LLC; J-PAD LLC; STEVEN D. GALLIAN; BRIAN J. GALLIAN; JUSTIN BARCLAY; RONALD J. PIERPONT; ROBERT J. MCLELLAND; AND E. J. GALLIAN,  Defendant(s).	CASE NO.: 8:21-bk-11710-SC CHAPTER: 7 ADVERSARY NO.: 8:23-ap-01064-SC  <b>REQUEST FOR CLERK TO ENTER DEFAULT UNDER LBR 7055-1(a)</b>  [No Hearing Required]

TO THE DEFENDANT, DEFENDANT'S ATTORNEY AND OTHER INTERESTED PARTIES:

1. Name of Defendant against whom default is sought (*specify name*): Ronald J. Pierpont
2. Plaintiff filed the complaint in this adversary proceeding on (*specify date*): 06/30/2023
3. The summons and complaint were served on Defendant by ☐ Personal Service ☒ Mail Service on the following date (*specify date*): 07/06/2023
4. A conformed copy of the executed service of summons form is attached hereto.
5. The time for filing an answer or other responsive pleading expired on (*specify date*): 08/02/2023
6. No answer or other responsive pleading has been filed or served by Defendant.

WHEREFORE, Plaintiff requests that the clerk of the court enter a default against this Defendant.

Date: 08/21/2023

/s/ Aaron E. de Leest  
Signature

AARON E. DE LEEST  
Printed name of Plaintiff or attorney for Plaintiff

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

**You must comply with LBR 7016–1, which requires you to file a joint status report and to appear at a status conference.** All parties must read and comply with the rule, even if you are representing yourself. You must cooperate with the other parties in the case and file a joint status report with the court and serve it on the appropriate parties at least 14 days before a status conference. A court–approved joint status report form is available on the court's website (LBR form F 7016–1.STATUS.REPORT) with an attachment for additional parties if necessary (LBR form F 7016–1.STATUS.REPORT.ATTACH). If the other parties do not cooperate in filing a joint status report, you still must file with the court a unilateral status report and the accompanying required declaration instead of a joint status report 7 days before the status conference. **The court may fine you or impose other sanctions if you do not file a status report. The court may also fine you or impose other sanctions if you fail to appear at a status conference.**

**KATHLEEN J. CAMPBELL**  
**CLERK OF COURT**

Date of Issuance of Summons and Notice of Status Conference in Adversary Proceeding: July 3, 2023

By: "s/" Nickie Bolte  
Deputy Clerk



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This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

**ATTACHMENT A**  
Names of plaintiffs and defendants

<b>Plaintiff(s):</b>	<b>Defendant(s):</b>
Jeffrey I. Golden	J–Sandcastle Co LLC J–Pad LLC Justin Barclay Steven D Gallian Ronald J. Pierpont Ronald J. McClelland E. J. Gallian Brian J. Gallian



## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

A true and correct copy of the foregoing document entitled: **SUMMONS AND NOTICE OF STATUS CONFERENCE IN ADVERSARY PROCEEDING [LBR 7004-1]** and (2) the accompanying pleading(s) entitled:

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) \_\_\_\_\_, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:



Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On (date) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.



Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.



Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

December 2016

**F 7004-1.SUMMONS.ADV.PROC**

<p align="center"><b>United States Bankruptcy Court</b>  <b>Central District of California</b></p> <p align="center"><b>411 West Fourth Street, Suite 2030, Santa Ana, CA 92701-4593</b></p>	
In re: Jamie Lynn Gallian	BANKRUPTCY CASE NO.: 8:21-bk-11710-SC
Debtor(s).	CHAPTER NO.: 7
Jeffrey I. Golden	ADVERSARY NO.: 8:23-ap-01064-SC
Plaintiff(s)	
Versus	
J-Sandcastle Co LLC	
(See Attachment A for names of additional defendants)	
Defendant(s)	

**NOTICE THAT CLERK HAS ENTERED DEFAULT AGAINST DEFENDANT(S)  
UNDER LOCAL BANKRUPTCY RULE 7055-1(a)**

On August 21, 2023, a request was filed for the clerk to enter default against defendant(s) Ronald J. Pierpont.  
Having reviewed the request, the clerk hereby enters default as requested.

Dated: August 22, 2023

For the Court,  
  
**KATHLEEN J. CAMPBELL, CLERK OF COURT**  
  
By: Nickie Bolte  
Deputy Clerk

**ATTACHMENT A**  
Names of plaintiffs and defendants

<b>Plaintiff(s):</b>  Jeffrey I. Golden	<b>Defendant(s):</b>  J–Sandcastle Co LLC J–Pad LLC Justin Barclay Steven D Gallian Ronald J. Pierpont Robert J. McLelland E. J. Gallian Brian J. Gallian
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**DEFER**

**U.S. Bankruptcy Court  
Central District of California (Santa Ana)  
Adversary Proceeding #: 8:23-ap-01064-SC**

*Assigned to:* Scott C Clarkson

*Date Filed:* 06/30/23

*Lead BK Case:* [21-11710](#)

*Lead BK Title:* Jamie Lynn Galian

*Lead BK Chapter:* 7

*Demand:* \$225000

*Nature[s] of Suit:* 13 Recovery of money/property - 548 fraudulent transfer  
21 Validity, priority or extent of lien or other interest in property  
91 Declaratory judgment  
02 Other (e.g. other actions that would have been brought in state court if unrelated to  
bankruptcy)

***Debtor***

-----  
**Jamie Lynn Galian**

16222 Monterey Ln SP #376

Huntington Beach, CA 92649

714-321-3449

SSN / ITIN: xxx-xx-3936

represented by **Jamie Lynn Galian**

PRO SE

***Plaintiff***

-----  
**Jeffrey I. Golden, Chapter 7 Trustee**

represented by **Aaron E. DE Leest**

Danning, Gill, Israel & Krasnoff, LLP

1901 Avenue of the Stars Ste 450

Los Angeles, CA 90067-6006

(310) 277-0077

Fax : (310) 277-5735

Email: [adeleest@DanningGill.com](mailto:adeleest@DanningGill.com)

**LEAD ATTORNEY**

**Shantal Malmed**

Danning Gill Israel and Krasnoff, LLP

1901 Avenue of the Stars, Ste. 450

Los Angeles, CA 90067

310-277-0077

Fax : 310-277-5735

Email: [shantal.malmed@gmlaw.com](mailto:shantal.malmed@gmlaw.com)

V.

*Defendant*

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**J-Sandcastle Co LLC**

represented by **J-Sandcastle Co LLC**  
PRO SE

*Defendant*

-----

**J-Pad LLC**

represented by **J-Pad LLC**  
PRO SE

*Defendant*

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**Steven D Gallian**

represented by **Steven D Gallian**  
PRO SE

*Defendant*

-----

**Justin Barclay**

represented by **Justin Barclay**  
PRO SE

*Defendant*

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**Ronald J. Pierpont**

represented by **Ronald J. Pierpont**  
PRO SE

*Defendant*

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**E. J. Gallian**

represented by **E. J. Gallian**  
PRO SE

***Defendant***

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**Brian J. Gallian**

represented by **Brian J. Gallian**  
PRO SE

***Defendant***

-----

**Robert J. McLelland**

16222 Monterey Ln Unit 376  
Huntington Beach, CA 92649  
(310) 729-1340

represented by **Robert J. McLelland**  
PRO SE

***Trustee***

-----

**Jeffrey I Golden (TR)**

Golden Goodrich LLP  
3070 Bristol Street, Suite 640  
Costa Mesa, CA 92626  
(714) 966-1000

represented by **Aaron E. DE Leest**  
Danning, Gill, Israel & Krasnoff, LLP  
1901 Avenue of the Stars  
Suite 450  
Los Angeles, CA 90067-6006  
310-277-0077  
Fax : 310-277-5735  
Email: [adeleest@DanningGill.com](mailto:adeleest@DanningGill.com)

**Eric P Israel**

Danning Gill Israel & Krasnoff, LLP  
1901 Avenue of the Stars, Suite 450  
Los Angeles, CA 90067-6006  
310-277-0077  
Fax : 310-277-5735  
Email: [eisrael@danninggill.com](mailto:eisrael@danninggill.com)

**Shantal Malmed**

(See above for address)

***U.S. Trustee***

-----

**United States Trustee (SA)**

411 W Fourth St., Suite 7160  
Santa Ana, CA 92701-4593  
(714) 338-3400

Filing Date	#	Docket Text
06/30/2023	<u><a href="#">1</a></u> (17 pgs)	Adversary case 8:23-ap-01064. Complaint by Jeffrey I. Golden, Chapter 7 Trustee against J-SANDCASTLE CO., LLC, J-PAD LLC, STEVEN D. GALLIAN, BRIAN J. GALLIAN, JUSTIN BARCLAY, RONALD J. PIERPONT, ROBERT J. MCLELLAND, E. J. GALLIAN. (\$350.00 Fee Charge To Estate). <i>Chapter 7 Trustee's Complaint: (1) To Avoid and Recover Fraudulent Transfers; (2) To Avoid and Recover PostPetition Transfers; (3) For Declaratory Relief; (4) For Breach of Contract; (5) For Money had and Received; and (6) Unjust Enrichment</i> Nature of Suit: (13 (Recovery of money/property - 548 fraudulent transfer)), (21 (Validity, priority or extent of lien or other interest in property)), (91 (Declaratory judgment)), (02 (Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy))) (DE Leest, Aaron) - See docket entry no.: 2 for corrections - Modified on 7/3/2023 (NB8). (Entered: 06/30/2023)
07/03/2023	2	Notice to Filer of Correction Made/No Action Required: <b>Incorrect plaintiff/defendant/attorney/party information was entered at the time of filing. Only use upper and lower case letters when entering names or documents in CM THE COURT HAS CORRECTED THIS INFORMATION. THIS ENTRY IS PROVIDED FOR FUTURE REFERENCE.</b> (RE: related document(s) <u><a href="#">1</a></u> Complaint) (NB8) (Entered: 07/03/2023)
07/03/2023	<u><a href="#">3</a></u> (8 pgs; 2 docs)	Summons Issued on Justin Barclay Date Issued 7/3/2023, Answer Due 8/2/2023; Brian J. Gallian Date Issued 7/3/2023, Answer Due 8/2/2023; E. J. Gallian Date Issued 7/3/2023, Answer Due 8/2/2023; Steven D Gallian Date Issued 7/3/2023, Answer Due 8/2/2023; J-Pad LLC Date Issued 7/3/2023, Answer Due 8/2/2023; J-Sandcastle Co LLC Date Issued 7/3/2023, Answer Due 8/2/2023; Ronald J. McClelland Date Issued 7/3/2023, Answer Due 8/2/2023; Ronald J. Pierpont Date Issued 7/3/2023, Answer Due 8/2/2023 (RE: related document(s) <u><a href="#">1</a></u> Complaint) Status Conference hearing to be held on 9/26/2023 at 01:30 PM at Crtrm 5C, 411 W Fourth St., Santa Ana, CA 92701. The case judge is Scott C Clarkson (NB8) (Entered: 07/03/2023)
07/05/2023	<u><a href="#">4</a></u> (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Goe, Robert. (Goe, Robert) (Entered: 07/05/2023)
07/06/2023	<u><a href="#">5</a></u> (5 pgs)	Summons Service Executed on Justin Barclay 7/6/2023; Brian J. Gallian 7/6/2023; E. J. Gallian 7/6/2023; Steven D Gallian 7/6/2023; J-Pad LLC 7/6/2023; J-Sandcastle Co LLC 7/6/2023; Ronald J. McClelland 7/6/2023; Ronald J. Pierpont 7/6/2023 (DE Leest, Aaron) (Entered: 07/06/2023)
07/06/2023	<u><a href="#">6</a></u> (6 pgs)	Notice - <i>Notice of Required Compliance with FRBP 7026 and LBR 7026-1; proof of service</i> Filed by Plaintiff Jeffrey I. Golden. (DE Leest, Aaron) (Entered: 07/06/2023)
07/18/2023	<u><a href="#">7</a></u> (8 pgs; 2 docs)	Another Summons Issued on Robert J. McLelland Date Issued 7/18/2023, Answer Due 8/17/2023 (RE: related document(s) <u><a href="#">1</a></u> Complaint) Status Conference hearing to be held on 9/26/2023 at 01:30 PM at Crtrm 5C, 411 W Fourth St., Santa Ana, CA 92701. The case judge is Scott C Clarkson (NB8) (Entered: 07/18/2023)
07/18/2023	<u><a href="#">8</a></u> (5 pgs)	Summons Service Executed on Robert J. McLelland 7/18/2023 (DE Leest, Aaron) (Entered: 07/18/2023)



07/18/2023	<a href="#"><u>9</u></a> (5 pgs)	Stipulation By Jeffrey I. Golden and <i>defendants Steven D. Gallian, Brian J. Gallian, Justin Barclay, and E.J. Gallian, to Continue Deadline to Respond to the Complaint; proof of service</i> Filed by Plaintiff Jeffrey I. Golden (DE Leest, Aaron) (Entered: 07/18/2023)
07/18/2023	<a href="#"><u>10</u></a> (6 pgs)	Notice of lodgment of <i>Order in Adversary Proceeding; proof of service</i> Filed by Plaintiff Jeffrey I. Golden (RE: related document(s) <a href="#"><u>9</u></a> Stipulation By Jeffrey I. Golden and <i>defendants Steven D. Gallian, Brian J. Gallian, Justin Barclay, and E.J. Gallian, to Continue Deadline to Respond to the Complaint; proof of service</i> Filed by Plaintiff Jeffrey I. Golden (DE Leest, Aaron) filed by Plaintiff Jeffrey I. Golden). (DE Leest, Aaron) (Entered: 07/18/2023)
07/25/2023	<a href="#"><u>11</u></a> (2 pgs)	ORDER Approving Stipulation To Continue Deadline For Defendants Steven D. Gallian, Brian J. Gallian; Justin Barclay, And E.J. Gallian To Respond To The Complaint. The Time Within Which Defendants Steven D. Gallian, Brian J. Gallian; Justin Barclay, And E.J. Gallian Must Answer The Trustee's Complaint In This Adversary Proceeding Is EXTENDED And CONTINUED TO SEPTEMBER 5, 2023. (BNC-PDF) (Related Doc # <a href="#"><u>9</u></a> ) Signed on 7/25/2023 (NB8) (Entered: 07/25/2023)
07/27/2023	<a href="#"><u>12</u></a> (4 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) <a href="#"><u>11</u></a> Order on Motion to Extend Time (Generic) (BNC-PDF)) No. of Notices: 1. Notice Date 07/27/2023. (Admin.) (Entered: 07/27/2023)
08/02/2023	<a href="#"><u>13</u></a> (9 pgs)	Answer To Complaint For: Chapter 7 Trustee's Complaint: (1) To Avoid And Recover Fraudulent Transfers; (2) To Avoid And Recover Postpetition Transfers; (3) For Declaratory Relief; (4) For Breach Of Contract; (5) For Money Had And Received; And (6) Unjust Enrichment Filed by Jamie Lynn Gallian . [EDB] (NB8) (Entered: 08/02/2023)
08/07/2023	<a href="#"><u>14</u></a> (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Barnhardt, Bradford. (Barnhardt, Bradford) (Entered: 08/07/2023)
08/07/2023	<a href="#"><u>15</u></a> (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Hays, D. (Hays, D) (Entered: 08/07/2023)
08/18/2023	<a href="#"><u>16</u></a> (7 pgs)	Answer To Complaint For: Chapter 7 Trustee's Complaint: (1) To Avoid And Recover Fraudulent Transfers; (2) To Avoid And Recover Post-Petition Transfers; (3) For Declaratory Relief; (4) For Breach Of Contract; (5) For Money Had And Received; And (6) Unjust Enrichment Filed by Robert J. McLelland . [EDB](NB8) (Entered: 08/21/2023)
08/21/2023	<a href="#"><u>17</u></a> (36 pgs)	Motion to strike <i>Plaintiff's Notice of Motion and Motion to Strike Debtor's Answer; Memorandum of Points and Authorities; and Request for Judicial Notice in Support Thereof, With Proof of Service</i> Filed by Trustee Jeffrey I Golden (TR), Plaintiff Jeffrey I. Golden (DE Leest, Aaron) (Entered: 08/21/2023)
08/21/2023	<a href="#"><u>18</u></a> (8 pgs)	Request for Entry of Default Under Local Bankruptcy Rule 7055-1, as to Ronald J. Pierpont Filed by Trustee Jeffrey I Golden (TR), Plaintiff Jeffrey I. Golden. (DE Leest, Aaron) (Entered: 08/21/2023)
08/21/2023	<a href="#"><u>19</u></a> (8 pgs)	Request for Entry of Default Under Local Bankruptcy Rule 7055-1, as to J-Pad LLC Filed by Trustee Jeffrey I Golden (TR), Plaintiff Jeffrey I. Golden. (DE Leest, Aaron) (Entered: 08/21/2023)

08/21/2023	<a href="#">20</a> (8 pgs)	Request for Entry of Default Under Local Bankruptcy Rule 7055-1, as to J-Sandcastle Co., LLC Filed by Trustee Jeffrey I Golden (TR), Plaintiff Jeffrey I. Golden. (DE Leest, Aaron) (Entered: 08/21/2023)
08/21/2023	21	Hearing Set (RE: related document(s) <a href="#">17</a> Plaintiff's Motion To Strike Debtor's Answer filed by Trustee Jeffrey I Golden (TR), Plaintiff Jeffrey I. Golden) The Hearing date is set for 9/12/2023 at 01:30 PM at Crtrm 5C, 411 W Fourth St., Santa Ana, CA 92701. The case judge is Scott C Clarkson (NB8) (Entered: 08/21/2023)
08/21/2023	<a href="#">22</a> (2 pgs)	Notice That a Default Has Not Been Entered by the Clerk Against Defendant(s) Ronald J. Pierpont (RE: related document(s) <a href="#">18</a> Request for Entry of Default (Local BK Rule 7055-1) filed by Trustee Jeffrey I Golden (TR), Plaintiff Jeffrey I. Golden) (NB8) (Entered: 08/21/2023)
08/21/2023	<a href="#">23</a> (2 pgs)	Notice That a Default Has Not Been Entered by the Clerk Against Defendant(s) J-PAD, LLC (RE: related document(s) <a href="#">19</a> Request for Entry of Default (Local BK Rule 7055-1) filed by Trustee Jeffrey I Golden (TR), Plaintiff Jeffrey I. Golden) (NB8) (Entered: 08/21/2023)
08/21/2023	<a href="#">24</a> (2 pgs)	Notice That a Default Has Not Been Entered by the Clerk Against Defendant(s) J-Sandcastle Co., LLC (RE: related document(s) <a href="#">20</a> Request for Entry of Default (Local BK Rule 7055-1) filed by Trustee Jeffrey I Golden (TR), Plaintiff Jeffrey I. Golden) (NB8) (Entered: 08/21/2023)
08/21/2023	<a href="#">25</a> (10 pgs)	Request for Entry of Default Under Local Bankruptcy Rule 7055-1, as to Ronald J. Pierpont Filed by Trustee Jeffrey I Golden (TR), Plaintiff Jeffrey I. Golden. (DE Leest, Aaron) (Entered: 08/21/2023)
08/21/2023	<a href="#">26</a> (10 pgs)	Request for Entry of Default Under Local Bankruptcy Rule 7055-1, as to J-Sandcastle Co., LLC Filed by Trustee Jeffrey I Golden (TR), Plaintiff Jeffrey I. Golden. (DE Leest, Aaron) (Entered: 08/21/2023)
08/21/2023	<a href="#">27</a> (10 pgs)	Request for Entry of Default Under Local Bankruptcy Rule 7055-1, as to J-Pad LLC Filed by Trustee Jeffrey I Golden (TR), Plaintiff Jeffrey I. Golden. (DE Leest, Aaron) (Entered: 08/21/2023)
08/22/2023	<a href="#">28</a> (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Masud, Laila. (Masud, Laila) (Entered: 08/22/2023)
08/22/2023	<a href="#">29</a> (2 pgs)	Notice That Clerk Has Entered Default Against Defendant(s) Ronald J. Pierpont (RE: related document(s) <a href="#">25</a> Request for Entry of Default (Local BK Rule 7055-1) filed by Trustee Jeffrey I Golden (TR), Plaintiff Jeffrey I. Golden) (NB8) (Entered: 08/22/2023)
08/22/2023	<a href="#">30</a> (2 pgs)	Notice That Clerk Has Entered Default Against Defendant(s) J-Sandcastle Co., LLC (RE: related document(s) <a href="#">26</a> Request for Entry of Default (Local BK Rule 7055-1) filed by Trustee Jeffrey I Golden (TR), Plaintiff Jeffrey I. Golden) (NB8) (Entered: 08/22/2023)
08/22/2023	<a href="#">31</a> (2 pgs)	Notice That Clerk Has Entered Default Against Defendant(s) J-Pad, LLC (RE: related document(s) <a href="#">27</a> Request for Entry of Default (Local BK Rule 7055-1) filed by Trustee Jeffrey I Golden (TR), Plaintiff Jeffrey I. Golden) (NB8) (Entered: 08/22/2023)

08/23/2023	<a href="#">32</a> (4 pgs)	BNC Certificate of Notice (RE: related document(s) <a href="#">22</a> Notice that Clerk Has Not Entered Default (BNC)) No. of Notices: 1. Notice Date 08/23/2023. (Admin.) (Entered: 08/23/2023)
08/23/2023	<a href="#">33</a> (4 pgs)	BNC Certificate of Notice (RE: related document(s) <a href="#">23</a> Notice that Clerk Has Not Entered Default (BNC)) No. of Notices: 1. Notice Date 08/23/2023. (Admin.) (Entered: 08/23/2023)
08/23/2023	<a href="#">34</a> (4 pgs)	BNC Certificate of Notice (RE: related document(s) <a href="#">24</a> Notice that Clerk Has Not Entered Default (BNC)) No. of Notices: 1. Notice Date 08/23/2023. (Admin.) (Entered: 08/23/2023)
08/24/2023	<a href="#">35</a> (4 pgs)	BNC Certificate of Notice (RE: related document(s) <a href="#">29</a> Notice that Clerk Has Entered Default (BNC)) No. of Notices: 1. Notice Date 08/24/2023. (Admin.) (Entered: 08/24/2023)
08/24/2023	<a href="#">36</a> (4 pgs)	BNC Certificate of Notice (RE: related document(s) <a href="#">30</a> Notice that Clerk Has Entered Default (BNC)) No. of Notices: 1. Notice Date 08/24/2023. (Admin.) (Entered: 08/24/2023)
08/24/2023	<a href="#">37</a> (4 pgs)	BNC Certificate of Notice (RE: related document(s) <a href="#">31</a> Notice that Clerk Has Entered Default (BNC)) No. of Notices: 1. Notice Date 08/24/2023. (Admin.) (Entered: 08/24/2023)
09/08/2023	<a href="#">38</a> (7 pgs)	Status report - <i>Joint Status Report; proof of service</i> Filed by Plaintiff Jeffrey I. Golden (RE: related document(s) <a href="#">1</a> Complaint). (DE Leest, Aaron) (Entered: 09/08/2023)
09/12/2023	<a href="#">39</a> (6 pgs)	Notice of lodgment <i>With Proof of Service</i> Filed by Trustee Jeffrey I Golden (TR) (RE: related document(s) <a href="#">17</a> Motion to strike <i>Plaintiff's Notice of Motion and Motion to Strike Debtor's Answer; Memorandum of Points and Authorities; and Request for Judicial Notice in Support Thereof, With Proof of Service</i> Filed by Trustee Jeffrey I Golden (TR), Plaintiff Jeffrey I. Golden (DE Leest, Aaron) filed by Trustee Jeffrey I Golden (TR), Plaintiff Jeffrey I. Golden). (Israel, Eric) (Entered: 09/12/2023)
09/12/2023	40	Hearing Held On Motion (RE: related document(s) <a href="#">17</a> Plaintiff's Motion To Strike Debtor's Answer filed by Trustee Jeffrey I Golden (TR), Plaintiff Jeffrey I. Golden) - ORDER BY ATTORNEY - MOTION GRANTED (NB8) (Entered: 09/15/2023)
09/20/2023	<a href="#">41</a> (2 pgs)	Order Granting Trustee's Motion to Strike Debtor's Answer; Ordered That: 1. Motion is Granted as to the Trustee Only, and the reference to Hauser Brothers is disregarded. 2. The Debtor's answer [docket no. 13] is Stricken. (BNC-PDF) (Related Doc # <a href="#">17</a> ) Signed on 9/20/2023 (AM) (Entered: 09/20/2023)
09/22/2023	<a href="#">42</a> (4 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) <a href="#">41</a> Order (Generic) (BNC-PDF)) No. of Notices: 2. Notice Date 09/22/2023. (Admin.) (Entered: 09/22/2023)
09/26/2023	<a href="#">43</a> (9 pgs)	Stipulation By Jeffrey I Golden (TR) and <i>Defendants Steven D. Gallian, Brian J. Gallian, Justin Barclay, and E.J. Gallian for Judgment to Avoid Liens; proof of service</i> Filed by Trustee Jeffrey I Golden (TR) (DE Leest, Aaron) (Entered: 09/26/2023)

09/26/2023	<a href="#">44</a> (7 pgs)	Notice of lodgment <i>in an Adversary Proceeding</i> ; <i>proof of service</i> Filed by Trustee Jeffrey I Golden (TR) (RE: related document(s) <a href="#">43</a> Stipulation By Jeffrey I Golden (TR) and <i>Defendants Steven D. Gallian, Brian J. Gallian, Justin Barclay, and E.J. Gallian for Judgment to Avoid Liens; proof of service</i> Filed by Trustee Jeffrey I Golden (TR) (DE Leest, Aaron) filed by Trustee Jeffrey I Golden (TR)). (DE Leest, Aaron) (Entered: 09/26/2023)
09/26/2023	45	Hearing Continued On Status Conference (RE: related document(s) <a href="#">1</a> Chapter 7 Trustee's Complaint: (1) To Avoid And Recover Fraudulent Transfers; (2) To Avoid And Recover Postpetition Transfers; (3) For Declaratory Relief; (4) For Breach Of Contract; (5) For Money Had And Received; And (6) Unjust Enrichment) - ORDER BY ATTORNEY - PRE-TRIAL CONFERENCE HEARING SET FOR MAY 28, 2024 AT 1:30 P.M. IN COURTROOM 5C, LOCATED AT 411 WEST FOURTH STREET, SANTA ANA, CA 92701. DISCOVERY CUTOFF: FEBRUARY 29, 2024. LAST DAY TO FILE PRE-TRIAL MOTIONS: APRIL 5, 2024. The case judge is Scott C Clarkson (NB8) (Entered: 10/02/2023)
10/03/2023	<a href="#">46</a> (2 pgs)	IT IS ORDERED: 1. The Discovery Cut-Off Date Shall Be February 29, 2024. This Date Includes The Date By Which All Discovery Motions, Shall Be Resolved. 2. The Last Date For Filing Pre-Trial Motions Is April 5, 2024. The Pre-Trial Conference Shall Be Held On MAY 28, 2024, AT 1:30 P.M. In Courtroom 5C, Located At 411 West Fourth Street, Santa Ana, CA 92701. (SEE ORDER FOR FURTHER RULING) (BNC-PDF) Signed on 10/3/2023. (NB8) (Entered: 10/03/2023)
10/03/2023	<a href="#">47</a> (3 pgs)	STIPULATED JUDGMENT Against Defendants Steven D. Gallian, Brian J. Gallian, Justin Barclay, And E. J. Gallian To Avoid Liens. IT IS ORDERED: The Stipulation For Judgment Is APPROVED In Its Entirety. Judgment Is Entered In Favor Of The Trustee And Against The Stipulating Defendants That The Stipulating Defendants Are Not Parties To Any Security Agreement Or Agreements That Would Grant Them A Security Interest In Or Lien On The Manufactured Home Located AT 16222 Monterey Lane, Space No. 376, Huntington Beach, CA 92649, Decal No. LBM1081, Serial Number: AC7V710394GA, AC7V710394GB (The "Property"). Judgment Is Entered In Favor Of The Trustee And Against The Stipulating Defendants That The Stipulating Defendants Have No Interest In The Property. Judgment Is Entered In Favor Of The Trustee And Against Steven D. Gallian And Brian J. Gallian That The "Statement To Encumber" (The "Statement To Encumber") That Was Executed And Submitted To The California Department Of Housing And Community Development (The "HCD") On Or About August 20, 2020, Adding Steven D. Gallian And Brian J. Gallian As Legal Owners (i.e., Lienholders) On The Certificate Of Title For The Property And Any Related Lien Is Avoided And Preserved For The Benefit Of The Debtor's Estate. Judgment Is Entered In Favor Of The Trustee And Against The Stipulating Defendants That The Following UCC Financing Statements (UCC-3) And Any Related Liens Are Avoided And Preserved For The Benefit Of The Debtor's Estate. The Trustee And The Stipulating Defendants Shall Bear Their Own Attorney's Fees And Costs. (SEE ORDER FOR FURTHER RULING) (BNC-PDF) (Related Doc # <a href="#">43</a> ) Signed on 10/3/2023 (NB8) (Entered: 10/03/2023)
10/05/2023	<a href="#">48</a> (4 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) <a href="#">46</a> Order (Generic) (BNC-PDF)) No. of Notices: 2. Notice Date 10/05/2023. (Admin.) (Entered: 10/05/2023)



10/05/2023	<a href="#">49</a> (5 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) <a href="#">47</a> JUDGMENT (BNC-PDF)) No. of Notices: 2. Notice Date 10/05/2023. (Admin.) (Entered: 10/05/2023)
10/09/2023	<a href="#">50</a> (3 pgs)	Notice of Change of Address <i>Notice of Attorney Change of Law Firm.</i> (Barnhardt, Bradford) (Entered: 10/09/2023)
10/09/2023	<a href="#">51</a> (4 pgs)	Notice of Change of Address <i>Notice of Attorney Change of Law Firm.</i> (Masud, Laila) (Entered: 10/09/2023)
01/25/2024	<a href="#">52</a> (6 pgs)	Stipulation By Jeffrey I Golden (TR) and <i>Defendant Robert J. McLelland. Stipulation for Judgment Between the Trustee and Defendant Robert J. McLelland, With Proof of Service.</i> Filed by Trustee Jeffrey I Golden (TR) (Malmed, Shantal) (Entered: 01/25/2024)
01/25/2024	<a href="#">53</a> (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Malmed, Shantal. (Malmed, Shantal) (Entered: 01/25/2024)
03/18/2024	<a href="#">54</a> (6 pgs)	Notice of lodgment <i>With Proof of Service</i> Filed by Trustee Jeffrey I Golden (TR) (RE: related document(s) <a href="#">52</a> Stipulation By Jeffrey I Golden (TR) and <i>Defendant Robert J. McLelland. Stipulation for Judgment Between the Trustee and Defendant Robert J. McLelland, With Proof of Service.</i> Filed by Trustee Jeffrey I Golden (TR) filed by Trustee Jeffrey I Golden (TR)). (Malmed, Shantal) (Entered: 03/18/2024)
03/21/2024	<a href="#">55</a> (7 pgs)	Notice of lodgment <i>Re Stipulated Judgment Against Defendant Robert J. McLelland to Avoid Liens, With Proof of Service</i> Filed by Trustee Jeffrey I Golden (TR) (RE: related document(s) <a href="#">52</a> Stipulation By Jeffrey I Golden (TR) and <i>Defendant Robert J. McLelland. Stipulation for Judgment Between the Trustee and Defendant Robert J. McLelland, With Proof of Service.</i> Filed by Trustee Jeffrey I Golden (TR) filed by Trustee Jeffrey I Golden (TR)). (Malmed, Shantal) (Entered: 03/21/2024)
03/21/2024	<a href="#">56</a> (6 pgs)	Notice of lodgment <i>re Proposed Order Approving Stipulated Judgement Against Defendant Robert J. McLelland to Avoid Liens, With Proof of Service</i> Filed by Trustee Jeffrey I Golden (TR) (RE: related document(s) <a href="#">52</a> Stipulation By Jeffrey I Golden (TR) and <i>Defendant Robert J. McLelland. Stipulation for Judgment Between the Trustee and Defendant Robert J. McLelland, With Proof of Service.</i> Filed by Trustee Jeffrey I Golden (TR) filed by Trustee Jeffrey I Golden (TR)). (Malmed, Shantal) (Entered: 03/21/2024)
03/26/2024	<a href="#">57</a> (1 pg)	Order Continuing Pre-Trial Conference. IT IS ORDERED: The Pre-Trial Conference Scheduled For May 28, 2024 Is Hereby CONTINUED TO JUNE 18, 2024, AT 1:30 P.M. In Courtroom 5C, Located At 411 West Fourth Street, Santa Ana, CA 92701. (BNC-PDF) Signed on 3/26/2024. (NB8) (Entered: 03/26/2024)
03/27/2024	<a href="#">58</a> (218 pgs)	Motion for Default Judgment - <i>Plaintiff's Motion for Default Judgment under LBR 7055-1 (Ronald J. Pierpont); proof of service</i> Filed by Plaintiff Jeffrey I. Golden Default Judgment Motion due by 04/26/2024. (Malmed, Shantal) (Entered: 03/27/2024)
03/27/2024	<a href="#">59</a> (247 pgs)	Motion for Default Judgment - <i>Plaintiff's Motion for Default Judgment under LBR 7055-1 (J-Sandcastle Co., LLC); proof of service</i> Filed by Plaintiff Jeffrey I. Golden Default Judgment Motion due by 04/26/2024. (Malmed, Shantal) (Entered: 03/27/2024)

03/27/2024	<a href="#">60</a> (345 pgs)	Motion for Default Judgment - <i>Plaintiff's Motion for Default Judgment under LBR 7055-1 (J-Pad LLC); proof of service</i> Filed by Plaintiff Jeffrey I. Golden Default Judgment Motion due by 04/26/2024. (Malmed, Shantal) (Entered: 03/27/2024)
03/27/2024	61	Hearing Set (RE: related document(s) <a href="#">58</a> Plaintiff's Motion For Default Judgment Under LBR 7055-1 Against Ronald J. Pierpont filed by Plaintiff Jeffrey I. Golden) The Hearing date is set for 5/7/2024 at 01:30 PM at Crtrm 5C, 411 W Fourth St., Santa Ana, CA 92701. The case judge is Scott C Clarkson (NB8) (Entered: 03/27/2024)
03/27/2024	62	Hearing Set (RE: related document(s) <a href="#">59</a> Plaintiff's Motion For Default Judgment Under LBR 7055-1 Against J-Sandcastle Co., LLC filed by Plaintiff Jeffrey I. Golden) The Hearing date is set for 5/7/2024 at 01:30 PM at Crtrm 5C, 411 W Fourth St., Santa Ana, CA 92701. The case judge is Scott C Clarkson (NB8) (Entered: 03/27/2024)
03/27/2024	63	Hearing Set (RE: related document(s) <a href="#">60</a> Plaintiff's Motion For Default Judgment Under LBR 7055-1 Against J-Pad LLC filed by Plaintiff Jeffrey I. Golden) The Hearing date is set for 5/7/2024 at 01:30 PM at Crtrm 5C, 411 W Fourth St., Santa Ana, CA 92701. The case judge is Scott C Clarkson (NB8) (Entered: 03/27/2024)
03/28/2024	<a href="#">64</a> (3 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) <a href="#">57</a> Order (Generic) (BNC-PDF)) No. of Notices: 2. Notice Date 03/28/2024. (Admin.) (Entered: 03/28/2024)
03/29/2024	<a href="#">65</a> (2 pgs)	Order Approving Stipulated Judgment Against Defendant Robert J. McLelland To Avoid Liens. IT IS ORDERED: 1. The Stipulation For Judgment Is APPROVED In Its Entirety. (BNC-PDF) (Related Doc # <a href="#">52</a> ) Signed on 3/29/2024 (NB8) (Entered: 03/29/2024)
03/29/2024	<a href="#">66</a> (3 pgs)	Stipulated Judgment Against Defendant Robert J. McLelland To Avoid Liens. IT IS ORDERED: 1. Judgment Is Entered In Favor Of The Trustee And Against The Stipulating Defendant That The Stipulating Defendant Is Not A Party To Any Security Agreement Or Agreements That Would Grant Him A Security Interest In Or Lien On The Manufactured Home Located At 16222 Monterey Lane, Space #376, Huntington Beach, CA 92649, Decal #LBM1081, Serial #AC7V710394GA, AC7V710394GB (The "Property"). 2. Judgment Is Entered In Favor Of The Trustee And Against The Stipulating Defendant That The Stipulating Defendant Has No Interest In The Property. 3. Judgment Is Entered In Favor Of The Trustee And Against Robert J. McLelland That The "Statement Of Facts" (The "Statement Of Facts") That Was Executed And Submitted To The California Department Of Housing And Community Development (The "HCD") On Or About August 2, 2021, Adding "J-Pad LLC Or Robert McLelland" As The Legal Owners (i.e., Lienholders) On The Certificate Of Title For Property And Any Related Lien Is Avoided And Preserved For The Benefit Of The Debtor's Estate. 4. Judgment Is Entered In Favor Of The Trustee And Against The Stipulating Defendant That The Following UCC Financing Statement Amendments (UCC-3) And Any Related Liens Are Avoided And Preserved For The Benefit Of The Debtor's Estate. 5. The Trustee And The Stipulating Defendant Shall Bear Their Own Attorney's Fees And Costs. 6. The Stipulating Defendant Shall Cooperate In A Timely Manner With The Trustee To Carry Out The Purpose And Effect Of The Stipulation For Judgment Including Executing Any Further Documents That May Be Required. 7. Pursuant Of Rule 54 Of The Federal Rules Of Civil Procedure There Is No Just Reason For Delay In Entry Of This Judgment Against The Stipulating Defendants. (SEE ORDER FOR FURTHER RULING) (BNC-PDF) (Related Doc # <a href="#">52</a> ) Signed on 3/29/2024 (NB8) (Entered: 03/29/2024)

		03/29/2024)
03/31/2024	<a href="#">67</a> (4 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) <a href="#">65</a> JUDGMENT (BNC-PDF)) No. of Notices: 2. Notice Date 03/31/2024. (Admin.) (Entered: 03/31/2024)
03/31/2024	<a href="#">68</a> (5 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) <a href="#">66</a> JUDGMENT (BNC-PDF)) No. of Notices: 2. Notice Date 03/31/2024. (Admin.) (Entered: 03/31/2024)
04/04/2024	<a href="#">69</a> (8 pgs)	Errata -Notice of Errata re Motion for Default Judgment under LBR 7055-1 (Ronald J. Pierpont); proof of service Filed by Plaintiff Jeffrey I. Golden (RE: related document(s) <a href="#">58</a> Motion for Default Judgment - Plaintiff's Motion for Default Judgment under LBR 7055-1 (Ronald J. Pierpont); proof of service). (DE Leest, Aaron) (Entered: 04/04/2024)
04/04/2024	<a href="#">70</a> (7 pgs)	Errata -Notice of Errata re Motion for Default Judgment unde LBR 7055-1 (J-Sandcastle Co., LLC); proof of service Filed by Plaintiff Jeffrey I. Golden (RE: related document(s) <a href="#">59</a> Motion for Default Judgment -Plaintiff's Motion for Default Judgment under LBR 7055-1 (J-Sandcastle Co., LLC); proof of service). (DE Leest, Aaron) (Entered: 04/04/2024)
04/04/2024	<a href="#">71</a> (8 pgs)	Errata -Notice of Errata re Motion for Default Judgment under LBR 7055-1 (J-Pad LLC); proof of service Filed by Plaintiff Jeffrey I. Golden (RE: related document(s) <a href="#">60</a> Motion for Default Judgment -Plaintiff's Motion for Default Judgment under LBR 7055-1 (J-Pad LLC); proof of service). (DE Leest, Aaron) (Entered: 04/04/2024)
04/04/2024	<a href="#">72</a> (7 pgs)	Notice of lodgment in an Adversary Proceeding; proof of service Filed by Plaintiff Jeffrey I. Golden (RE: related document(s) <a href="#">58</a> Motion for Default Judgment -Plaintiff's Motion for Default Judgment under LBR 7055-1 (Ronald J. Pierpont); proof of service Filed by Plaintiff Jeffrey I. Golden Default Judgment Motion due by 04/26/2024. filed by Plaintiff Jeffrey I. Golden). (DE Leest, Aaron) (Entered: 04/04/2024)
04/04/2024	<a href="#">73</a> (6 pgs)	Notice of lodgment of Judgment in an Adversary Proceeding; proof of service Filed by Plaintiff Jeffrey I. Golden (RE: related document(s) <a href="#">59</a> Motion for Default Judgment -Plaintiff's Motion for Default Judgment under LBR 7055-1 (J-Sandcastle Co., LLC); proof of service Filed by Plaintiff Jeffrey I. Golden Default Judgment Motion due by 04/26/2024. filed by Plaintiff Jeffrey I. Golden). (DE Leest, Aaron) (Entered: 04/04/2024)
04/04/2024	<a href="#">74</a> (7 pgs)	Notice of lodgment of Judgment in Adversary Proceeding; proof of service Filed by Plaintiff Jeffrey I. Golden (RE: related document(s) <a href="#">60</a> Motion for Default Judgment -Plaintiff's Motion for Default Judgment under LBR 7055-1 (J-Pad LLC); proof of service Filed by Plaintiff Jeffrey I. Golden Default Judgment Motion due by 04/26/2024. filed by Plaintiff Jeffrey I. Golden). (DE Leest, Aaron) (Entered: 04/04/2024)
04/05/2024	<a href="#">75</a> (4 pgs)	Voluntary Dismissal of Motion Notice of Withdrawal of Motion for Default Judgment Under LBR 7055-1 Against J-Pad LLC (Docket No. 60) and Notice of Errata (Docket No. 71), With Proof of Service Filed by Trustee Jeffrey I Golden (TR) (RE: related document(s) <a href="#">60</a> Motion for Default Judgment -Plaintiff's Motion for Default Judgment under LBR 7055-1 (J-Pad LLC); proof of service). (DE Leest, Aaron) (Entered: 04/05/2024)

04/05/2024	<a href="#">76</a> (316 pgs)	Motion for Default Judgment <i>Plaintiff's Motion for Default Judgment Under LBR 7055-1 (J-PAD LLC), With Proof of Service</i> Filed by Trustee Jeffrey I Golden (TR) Default Judgment Motion due by 05/6/2024. (Malmed, Shantal) (Entered: 04/05/2024)
04/05/2024	77	Hearing Set (RE: related document(s) <a href="#">76</a> Plaintiff's Motion For Default Judgment Under LBR 7055-1 Against J-PAD LLC filed by Trustee Jeffrey I Golden (TR)) The Hearing date is set for 5/7/2024 at 01:30 PM at Crtrm 5C, 411 W Fourth St., Santa Ana, CA 92701. The case judge is Scott C Clarkson (NB8) (Entered: 04/08/2024)
05/07/2024	90	Hearing Held On Motion (RE: related document <a href="#">58</a> Plaintiff's Motion For Default Judgment Under LBR 7055-1 Against Ronald J. Pierpont) - ORDER BY ATTORNEY - BY DEFAULT MOTION GRANTED (NB8) (Entered: 05/13/2024)
05/07/2024	91	Hearing Held On Motion (RE: related document <a href="#">59</a> Plaintiff's Motion For Default Judgment Under LBR 7055-1 Against J-Sandcastle Co., LLC) - ORDER BY ATTORNEY - BY DEFAULT MOTION GRANTED (NB8) (Entered: 05/13/2024)
05/07/2024	92	Hearing Held On Motion (RE: related document <a href="#">60</a> Plaintiff's Motion For Default Judgment Under LBR 7055-1 Against J-Pad LLC) HEARING ON MOTION OFF CALENDAR PER NOTICE OF WITHDRAWAL OF MOTION FOR DEFAULT JUDGMENT UNDER LBR7055-1 AGAINST J-PAD LLC (DOCKET nO. <a href="#">60</a> ) AND NOTICE OF ERRATA (DOCKET NO. <a href="#">7</a> ) FILED 4-5-2024 - (DOCKET NO. <a href="#">75</a> ) (NB8) (Entered: 05/13/2024)
05/07/2024	93	Hearing Held On Motion (RE: related document <a href="#">76</a> Plaintiff's Motion For Default Judgment Under LBR 7055-1 Against J-Pad LLC) - ORDER BY ATTORNEY - BY DEFAULT MOTION GRANTED (NB8) (Entered: 05/13/2024)
05/10/2024	<a href="#">78</a> (2 pgs)	Order Granting Motion For Default Judgment Against Defendant J-Pad LLC. IT IS ORDERED: 1. The Motion Is GRANTED In Its Entirety. 2. A Separate Judgment Against The Defendant Will Be Entered Contemporaneously Herewith. (BNC-PDF) (Related Doc # <a href="#">76</a> ) Signed on 5/10/2024. (NB8) (Entered: 05/10/2024)
05/10/2024	<a href="#">79</a> (3 pgs)	DEFAULT JUDGMENT Against J-Pad LLC. IT IS ORDERED: Re: 1. Default Judgment Is Entered In Favor Of The Plaintiff And Against The Defendant On The Plaintiff's First And Fifth Claims For Relief In The Complaint. 2. The Transfer To The Defendant Of A Lien On And Security Interest In The Manufactured Home Located At 16222 Monterey Lane, Space #376, Huntington Beach, CA 92649, Decal # LBM1081, Serial # AC7V710394GA, AC7V710394GB (The Property) Reflected By The Secured Promissory Note And Security Agreement Between J-Sandcastle Co., LLC And The Defendant Dated November 16, 2018 And Lien On The Property In The Amount Of \$225,000 In Favor Of The Defendant Are Avoided And Preserved For The Benefit Of The Debtor's Estate In The Name Of Jeffrey I. Golden, Chapter 7 Trustee For The Bankruptcy Estate Of Jamie Lynn Gallian. 3. The Transfers To The Defendant Relating To The Property, Including The following UCC Financing Statements (UCC-1) And UCC Financing Statement Amendments (UCC-3), And Any Liens On The Property In Favor Of The Defendant Are Avoided And Preserved For The Benefit Of The Debtor's Estate In The Name Of Jeffrey I. Golden, Chapter 7 Trustee For The Bankruptcy Estate Of Jamie Lynn Gallian. 4. The Debtor's Transfers To The Defendant Reflected By The Statement Of Facts Submitted To The California Department Of Housing And



		Community Development On Or About August 6, 2021, Stating That The Legal Owner Of The Property Was The Defendant And That The Defendant Perfected Its Lien On January 14, 2019, And The Statement To Encumber Executed On January 14, 2019, Reflecting That The Legal Owner Of The Property Was The Defendant And Any Liens On The Property In Favor Of The Defendant Are Avoided And Preserved For The Benefit Of The Debtor's Estate In The Name Of Jeffrey I. Golden, Chapter 7 Trustee For The Bankruptcy Estate Of Jamie Lynn Gallian. 5. Pursuant Of Rule 54 Of The Federal Rules Of Civil Procedure There Is No Just Reason For Delay In Entry Of This Judgment Against The Defendant. (SEE ORDER FOR FURTHER RULING) (BNC-PDF) Signed on 5/10/2024 (RE: related document(s) <a href="#">76</a> Motion for Default Judgment filed by Trustee Jeffrey I Golden (TR)). (NB8) (Entered: 05/10/2024)
05/10/2024	<a href="#">80</a> (2 pgs)	Order Granting Motion For Default Judgment Against Defendant J-Sandcastle Co., LLC. IT IS ORDERED: 1. The Motion Is GRANTED In Its Entirety. 2. A Separate Judgment Against The Defendant Will Be Entered Contemporaneously Herewith. (BNC-PDF) (Related Doc # <a href="#">59</a> ) Signed on 5/10/2024. (NB8) (Entered: 05/10/2024)
05/10/2024	<a href="#">81</a> (2 pgs)	DEFAULT JUDGMENT Against J-Sandcastle Co., LLC. IT IS ORDERED: 1. Default Judgment Is Entered In Favor Of The Plaintiff And Against The Defendant On The Plaintiffs First Claim For Relief In The Complaint. 2. The Debtor's Transfers Of The Manufactured Home Located At And Commonly Known As 16222 Monterey Lane, Space #376, Huntington Beach, CA 92649, Decal # LBM1081, Serial # AC7V710394GA, AC7V710394GB (The Property) To The Defendant, Including Transferring Title To The Property On Or About November 15, 2018 And November 20, 2018, Are Hereby Avoided And Legal Title To The Property And The Beneficial Interest In The Property (Collectively The Subject Transfers) Is Recovered For The Benefit Of The Bankruptcy Estate In The Name Of Jeffrey I. Golden, Chapter 7 Trustee For The Bankruptcy Estate Of Jamie Lynn Gallian. 3. The Subject Transfers Are Preserved For The Benefit Of The Estate Pursuant To 11 U.S.C. § 551. 4. Pursuant Of Rule 54 Of The Federal Rules Of Civil Procedure There Is No Just Reason For Delay In Entry Of This Judgment Against The Defendant. (BNC-PDF) Signed on 5/10/2024 (RE: related document(s) <a href="#">59</a> Motion for Default Judgment filed by Plaintiff Jeffrey I. Golden). (NB8) (Entered: 05/10/2024)
05/10/2024	<a href="#">82</a> (2 pgs)	Order Granting Motion For Default Judgment Against Defendant Ronald J. Pierpont. IT IS ORDERED: 1. The Motion Is GRANTED In Its Entirety. 2. A Separate Judgment Against The Defendant Will Be Entered Contemporaneously Herewith. (BNC-PDF) (Related Doc # <a href="#">58</a> ) Signed on 5/10/2024. (NB8) (Entered: 05/10/2024)
05/10/2024	<a href="#">83</a> (3 pgs)	DEFAULT JUDGMENT Against Ronald J. Pierpont. IT IS ORDERED: 1. Default Judgment Is Entered In Favor Of The Plaintiff And Against The Defendant On The Plaintiff's Fifth And Sixth Claims For Relief In The Complaint. 2. The Defendant Is Not A Party To Any Security Agreement Or Agreements That Would Grant Defendant A Security Interest In Or Lien On The Manufactured Home Located At 16222 Monterey Lane, Space #376, Huntington Beach, CA 92649, Decal # LBM1081, Serial # AC7V710394GA, AC7V710394GB (The Property). 3. The Defendant Has No Interest In The Property. 4. The Defendant Does Not Have Any Valid, Perfected, And/Or Unavoidable Liens On The Property. 5. The Transfers To The Defendant Relating To The Property, Including The following UCC Financing Statement Amendments (UCC-3), And Any Liens On The Property In Favor Of The Defendant Are Avoided And Preserved For The Benefit Of The Debtor's Estate In The Name Of Jeffrey I. Golden, Chapter 7 Trustee For The Bankruptcy Estate Of Jamie Lynn Gallian. 6. Pursuant Of Rule 54

		Of The Federal Rules Of Civil Procedure There Is No Just Reason For Delay In Entry Of This Judgment Against The Defendant. (SEE ORDER FOR FURTHER RULING) (BNC-PDF) Signed on 5/10/2024 (RE: related document(s) <a href="#">58</a> Motion for Default Judgment filed by Plaintiff Jeffrey I. Golden). (NB8) (Entered: 05/10/2024)
05/12/2024	<a href="#">84</a> (5 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) <a href="#">79</a> DEFAULT JUDGMENT (BNC-PDF)) No. of Notices: 2. Notice Date 05/12/2024. (Admin.) (Entered: 05/12/2024)
05/12/2024	<a href="#">85</a> (4 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) <a href="#">81</a> DEFAULT JUDGMENT (BNC-PDF)) No. of Notices: 2. Notice Date 05/12/2024. (Admin.) (Entered: 05/12/2024)
05/12/2024	<a href="#">86</a> (5 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) <a href="#">83</a> DEFAULT JUDGMENT (BNC-PDF)) No. of Notices: 2. Notice Date 05/12/2024. (Admin.) (Entered: 05/12/2024)
05/12/2024	<a href="#">87</a> (4 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) <a href="#">78</a> Order on Motion for Default Judgment (BNC-PDF)) No. of Notices: 2. Notice Date 05/12/2024. (Admin.) (Entered: 05/12/2024)
05/12/2024	<a href="#">88</a> (4 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) <a href="#">80</a> Order on Motion for Default Judgment (BNC-PDF)) No. of Notices: 2. Notice Date 05/12/2024. (Admin.) (Entered: 05/12/2024)
05/12/2024	<a href="#">89</a> (4 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) <a href="#">82</a> Order on Motion for Default Judgment (BNC-PDF)) No. of Notices: 2. Notice Date 05/12/2024. (Admin.) (Entered: 05/12/2024)
05/28/2024	94	Hearing Continued On Pre-Trial Conference (RE: related document(s) <a href="#">1</a> Chapter 7 Trustee's Complaint: (1) To Avoid And Recover Fraudulent Transfers; (2) To Avoid And Recover Postpetition Transfers; (3) For Declaratory Relief; (4) For Breach Of Contract; (5) For Money Had And Received; And (6) Unjust Enrichment) - PRE-TRIAL CONFERENCE HEARING CONTINUED TO JUNE 18, 2024 AT 1:30 P.M. IN COURTROOM 5C, LOCATED AT 411 WEST FOURTH STREET, SANTA ANA, CA 92701 PER ORDER CONTINUING PRE-TRIAL CONFERENCE ENTERED 3-26-2024 - (DOCKET NO. <a href="#">57</a> ) The case judge is Scott C Clarkson (NB8) (Entered: 05/28/2024)
06/04/2024	<a href="#">95</a> (7 pgs)	Status report - <i>Status Report for Pretrial Conference and Request to Dismiss Remaining Alternative and Additional Claims for Relief; proof of service</i> Filed by Plaintiff Jeffrey I. Golden (RE: related document(s) <a href="#">1</a> Complaint). (DE Leest, Aaron) (Entered: 06/04/2024)
06/18/2024	96	Hearing Held On Pre-Trial Conference (RE: related document <a href="#">1</a> Chapter 7 Trustee's Complaint: (1) To Avoid And Recover Fraudulent Transfers; (2) To Avoid And Recover Postpetition Transfers; (3) For Declaratory Relief; (4) For Breach Of Contract; (5) For Money Had And Received; And (6) Unjust Enrichment) - ORDER BY ATTORNEY - PRE-TRIAL CONFERENCE HEARING HELD - REQUEST TO DISMISS ALL REMAINING CLAIMS WITHOUT PREJUDICE GRANTED. (NB8) Modified on 6/28/2024 (NB8). (Entered: 06/28/2024)
07/01/2024	<a href="#">97</a> (7 pgs)	Notice of lodgment of order in Adversary Proceeding; proof of service Filed by Trustee Jeffrey I Golden (TR) (RE: related document(s) <a href="#">1</a> Adversary case 8:23-ap-01064. Complaint by Jeffrey I. Golden, Chapter 7 Trustee against J-SANDCASTLE CO., LLC, J-PAD LLC, STEVEN D. GALLIAN, BRIAN J. GALLIAN, JUSTIN BARCLAY, RONALD J.

		PIERPONT, ROBERT J. MCLELLAND, E. J. GALLIAN. (\$350.00 Fee Charge To Estate). <i>Chapter 7 Trustee's Complaint: (1) To Avoid and Recover Fraudulent Transfers; (2) To Avoid and Recover PostPetition Transfers; (3) For Declaratory Relief; (4) For Breach of Contract; (5) For Money had and Received; and (6) Unjust Enrichment</i> Nature of Suit: (13 (Recovery of money/property - 548 fraudulent transfer)),(21 (Validity, priority or extent of lien or other interest in property)),(91 (Declaratory judgment)),(02 (Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy))) (DE Leest, Aaron) - See docket entry no.: 2 for corrections - Modified on 7/3/2023 (NB8).). (DE Leest, Aaron) (Entered: 07/01/2024)
07/09/2024	<a href="#">98</a> (2 pgs)	Order Dismissing Trustee's Alternative And Remaining Claims Against The Defendants Without Prejudice. IT IS ORDERED: 1. The Alternative And Remaining Claims For Relief In The Plaintiff's Complaint Are DISMISSED Without Prejudice, As Follows: a. The Seventh Claim For Relief Is DISMISSED Against Defendants Steven D. Gallian, Brian J. Gallian, Justin Barclay, E. J. Gallian, And Robert J. McLelland, Without Prejudice. b. The First, Second, Third, Fourth, And Seventh Claims For Relief Are DISMISSED Against Defendant Ronald J. Pierpont, Without Prejudice. c. The Second, Third, Fourth, Sixth, Seventh, Eighth, Ninth, And Tenth Claims For Relief Are DISMISSED Against Defendant J-Pad LLC Without Prejudice. d. The Second, Third, Fourth, Fifth, Sixth, And Seventh Claims For Relief Are DISMISSED Against Defendant J-Sandcastle Co., LLC, Without Prejudice. (BNC-PDF) Signed on 7/9/2024. (NB8) (Entered: 07/09/2024)
07/11/2024	<a href="#">99</a> (4 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) <a href="#">98</a> Order (Generic) (BNC-PDF)) No. of Notices: 2. Notice Date 07/11/2024. (Admin.) (Entered: 07/11/2024)

PACER Service Center			
Transaction Receipt			
07/18/2024 09:01:45			
PACER Login:	Slurpyjam	Client Code:	
Description:	Docket Report	Search Criteria:	8:23-ap-01064-SC Fil or Ent: filed From: 4/19/2022 To: 7/18/2024 Doc From: 0 Doc To: 99999999 Term: included Format: html Page counts for documents: included
Billable Pages:	11	Cost:	1.10

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
16222 MONTEREY LANE UNIT 378 HUNTINGTON BEACH, CA 92649

A true and correct copy of the foregoing document entitled (*specify*): NOTICE OF MOTION AND MOTION TO SET ASID  
JUDGMENT AGAINST RONALD PIERPONT; DECLARATION OF RONALD PIERPONT IN SUPPORT THEREOF  
EXHIBITS

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 8/26/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (*date*) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

8/26/24

JOSEPH CLARK

Date

Printed Name

Signature

*Joseph Clark*

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.



**1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”)**

Aaron E. DE Leest on behalf of Plaintiff Jeffrey I. Golden  
adeleest@DanningGill.com, danninggill@gmail.com;adeleest@ecf.inforuptcy.com

Jeffrey I Golden (TR)  
lwerner@go2.law, jig@trustesolutions.net;kadele@go2.law;C205@ecfcbis.com

United States Trustee (SA)  
ustpreion16.sa.ecf@usdoj.gov

**2. SERVED BY U.S. MAIL**

J-Sandcastle Co., LLC  
Jamie Lynn Gallian, Managing Member  
16222 Monterey Ln Unit 376  
Huntington Beach, CA 92649

J-Pad LLC  
Jamie Lynn Gallian, Managing Member  
16222 Monterey Ln Unit 376  
Huntington Beach, CA 92649

The Honorable Scott C. Clarkson  
U.S. Bankruptcy Court  
411 W. Fourth Street, Suite 5130  
Santa Ana, CA 92701